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ABSTRACT

The implementation of Alaska's bilingual-bicultural education policy in the Lower Kuskokwim School District, which serves a predominantly Eskimo population, was investigated. The research objectives were to describe policy implementation, analyze problems with implementation, and explain why the local programs diverged from the intent of state policy. Participants' views of the implementation process were determined through interviews, observation, and document analysis. The interviews were conducted among school administrators, bilingual teachers, school personnel, school board members, high school students, and parents. Based on examination of 10 local programs, state policy appears to have fostered 3 basic approaches to bilingual program development: transitional enrichment, enrichment maintenance, and enrichment restoration. Each approach suffers from four major implementation problems: vague goals, lack of state personnel to monitor enforcement, inadequately trained personnel, and lack of guidelines for evaluating program outcomes. Broad policy guidelines such as those of Alaska provide flexibility for local implementers to develop programs according to local needs. Thus, variations among local programs occur which may be inconsistent with federal policy goals. Alaska bilingual education regulations and a bibliography are appended. (Author/RW)

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A CASE STUDY OF IMPLEMENTING ALASKA'S BILINGUAL EDUCATION POLICY

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ABSTRACT

This study analyzes implementation of Alaska's bilingual-bicultural education policy in the Lower Kuskokwim School District (LKSD) which serves a predominately Eskimo population. The research objectives were to describe policy implementation, analyze problems encountered during implementation of LKSD programs under Alaska's bilingual-biculural education policy, and explain why the programs diverged from the intent of state policy.

A standard qualitative research design was utilized, because the research focused on the program participants' perspectives of the implementation process. Three data collection techniques were employed: intensive interviewing, transient observation, and document analysis. These techniques were triangulated to develop findings and interpretations. Interview subjects included school administrators, bilingual teachers, and individuals selected randomly from five groups: school personnel working directly in implementing bilingual programs, individuals external to the daily operation of programs, school board members, high school students, and parents of participating students.

The state's bilingual-bicultural education policy, initiated in 1977, is complex and attempts to address a variety of local situations. Based on an examination of ten LKSD programs, the policy appears to have fostered three basic approaches to bilingual program development: transitional enrichment, enrichment maintenance, and enrichment restor-

ation. Each approach suffers from four major implementation problems: multiple, vague policy goals creating conflict among local implementers as to program goals; inadequate state personnel to monitor or enforce policy guidelines; inadequately trained personnel to implement the policy guidelines; and lack of specific guidelines for identifying or measuring program outcomes, making program success or failure difficult to evaluate.

Broad, general policy guidelines provide latitude and flexibility for local implementers to develop programs according to local needs and goals. Local priorities contribute to program variations. From the local perspective, the programs are a success, because they reflect aspects of community needs and aspirations. From the state-federal perspective, the clear and uniform outcomes contemplated by federal criteria are not achieved. This experience suggests that federal reform measures intended to produce similar outcomes in a variety of community contexts will continue to result in variable outcomes.

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INTRODUCTION

The introduction of bilingual education programs as an alternative for language minority children in elementary and secondary schools has sparked significant controversy among not only community leaders and parents but also among policy makers at different governmental levels (federal, state, and local). As bilingual policy in Alaska has evolved through significant alterations caused by federal intervention and the influx of large sums of money, it is important to examine the impact of the policy in terms of its implementation. Analysis of the implementation process should yield valuable information as to how the policy works in practice, identification and explanation of implementation problems, and implications for federally initiated education reform.

This paper is divided into five chapters. Chapter I outlines the historical events leading to major state policy changes. Chapter II describes the research problem, methodology, and setting. Chapter III describes the reform in practice, the problems encountered, and local perceptions of the program. Based upon empirical research studies and conceptual essays, three competing views of the implementation process are presented in Chapter IV. In Chapter V, the three concepts of social policy implementation are applied to analyze and explain the Lower Kuskokwim School District's

bilingual program implementation processes. In Chapter VI, a summary and conclusion on implementing bilingual education reform in the lower Kuskokwim School District are presented.

Chapter I. HISTORICAL BACKGROUND

FEDERAL INITIATIVES

Mandated bilingual education programs for students of limited English speaking ability are spreading throughout the nation. Bilingual education, as an educational alternative to English only curriculums, is a growing part of a greater demand for equal educational opportunity for language minority students. Bilingual education has also become increasingly controversial as a result of federal enforcement and litigation initiated on behalf of language minority students.

The first expression of a federally mandated equal education opportunity policy for language minority students came in 1970 when the Department of Health, Education and Welfare (HEW) issued its May 25 Memorandum which required federally funded school districts with more than five percent national origin minority group children to provide special assistance to these children. Failure to provide such assistance would be considered a violation of Title VI of the Civil Rights Act (1964). Although school districts were required to provide some form of program to meet the needs of language minority students, the May 25 Memorandum did not specify the type(s) of program that would be accept-

able.

It was not until 1973, when the United States Supreme Court decided in Lau v. Nichols,[1] that school districts were compelled under Title VI of the Civil Rights Act (1964) to provide children who spoke little or no English with special language programs that would give them an equal opportunity to education. Lau v. Nichols was a class action suit which charged the San Francisco Unified School District with failure to provide all non-English speaking students with special instruction to equalize their educational opportunity. The court held that equal educational opportunity had been denied:

> Under these state-imposed standards there is no equality of treatment merely by providing students with the same facilities, textbooks, teachers, and curriculum; for students who do not understand English are effectively foreclosed from any meaningful education.
>
> Basic English skills are at the very core of what these public schools teach. Imposition of a requirement that before a child can effectively participate in the educational program, he must already have acquired those basic skills is to make a mockery of public education. We know that those who do not understand English are certain to find their classroom experiences wholly incomprehensible and in no way meaningful.[2]

The Supreme Court and, in turn, the district court refused to prescribe an appropriate remedy in the form of

specific acceptable programs, leaving that to the San Francisco Unified School District. A citizens' task force and HEW worked with the District to develop a remedy consistent with the court's decision and to develop guidelines[3] for determining whether other school districts are in compliance with Title VI of the Civil Rights Act (1964).

BILINGUAL EDUCATION IN ALASKA

Prior to 1970 there were few, if any, institutions formally involved in elementary and secondary bilingual education activities. Early efforts were fragmentary, sporadic, and dependent on categorical federal funds; however several federal and state funded institutions began to emerge: the Eskimo Language Workshop (1969), the Alaska State Operated School System (1971), the Alaska Native Language Center of the University of Alaska in Fairbanks (1972), and the Alaska Native Education Board (1973). In 1970 two Central Yup'ik bilingual education programs were initiated in the Yukon Kuskokwim Delta area. The Seventh Alaska State Legislature established its first bilingual education law in 1972 "calling for the establishment of bilingual education programs in those schools of the [Alaska] State-Operated-Schools-System with 15 or more students of limited English speaking ability."[4] Thus, the state bilingual mandate was directed to only one school district in the entire state (the Alaska

State Operated School System-ASOSS) which enrolled a majority of the state's language minority students.

While all four of the foregoing institutions were engaged in some form of bilingual education activity--e.g., materials development, bilingual program operations, scientific studies of the various Alaska Native languages--there was little direction and no leadership provided by the state. Bilingual programs and activities foundered due to lack of centralized leadership and technical knowledge regarding the operation of remotely scattered programs with varying Native language situations and usage. There was uncertainty about program purposes and goals; there were conflicting territorial interests and agendas among the agencies for the few operational programs. Until 1975, the primary agencies involved in bilingual education struggled autonomously with limited plans for bilingual education statewide.

Commencing in 1972, the Alaska legislature appropriated $375,000 per year for bilingual education in the ASOSS. The appropriations remained at that level until 1976 when the bilingual budget was increased to $600,000. Prior to that time, state funded bilingual programs in public elementary and secondary schools existed only in those rural schools under ASOSS's jurisdiction. Because the general program plans covered such a large geographical area, it is diffi-

cult to determine what was being implemented at the local levels. However, it may be assumed that any programs which were implemented functioned according to local discretion with little direction from the central administrative office in Anchorage.

CHRONOLOGICAL HISTORY OF EVENTS LEADING TO THE STATE'S FEDERAL COMPLIANCE

The impetus for the state bilingual education reform and the adversarial climate among intergovernmental agencies at the federal, state, and local levels must be understood in the context of two events: the findings of the United States Office for Civil Rights (OCR), and the decentralization of ASOSS, then the largest school district in Alaska. The educational policy changes resulting from OCR's findings and ASOSS's decentralization are closely interwoven; both impacted rural Alaska significantly in terms of instituting local governance and increasing local input into education policy and practices.

In January 1975, OCR issued letters of inquiry to three school districts in Alaska: the Anchorage School District, the Fairbanks North Star Borough School District, and ASOSS. OCR requested information pertaining to compliance issues under the Civil Rights Act of 1964, i.e., identifica-

tion of the language characteristics of students and an explanation of the special services provided to those students whose first language was other than English. In March 1975, ASOSS submitted its data to OCR in Washington, D.C.

On June 9, 1975, Senate Bill 35 was enacted by the Alaska Legislature decentralizing ASOSS into 21 independently managed school districts. Senate Bill 35 abolished ASOSS and established an interim school district known as the Alaska Unorganized Borough School District (AUBSD) which would function until July 1, 1976, at which time the 21 new school districts would be activated as set forth in Senate Bill 35. In addition to decentralization, Senate Bill 35 greatly expanded the state's bilingual education mandate ("calling for bilingual-bicultural education programs in those schools with eight or more students of limited English-speaking ability"[5]) to include all public schools with at least eight limited English speaking students.

In August 1975, OCR requested additional data from the then defunct ASOSS. AUBSD responded by advising OCR of its transitional nature and pointing out its limited existence and responsibilities for the schools in question. In November 1975, AUBSD was informed by OCR that it was in "presumptive noncompliance"; specifically, "ASOSS/AUBSD had failed to serve its students who had language problems."[6] AUBSD was given thirty days to "(1) assess the number of students

with language problems; (2) develop a comprehensive educational plan specifically detailing how children with language problems would be served, with approval of the plan to be made by OCR; and (3) impose on the [twenty-one] districts then forming under Senate Bill 35, the comprehensive educational plan developed by AUBSD and approved by OCR."[7] In January 1976, AUBSD further advised OCR that it neither had the authority, resources, nor time to comply with OCR's demands, requesting that OCR negotiate with each of the twenty-one new districts.

On March 26, 1976, OCR found AUBSD to be in non-compliance with Title VI of the Civil Rights Act (1964). Failure to comply with OCR's earlier request to assess students and develop an approved educational plan for the twenty-one new districts would result in a withdrawal of federal funds from AUBSD and the newly created districts. With less than four months of legal existence remaining, AUBSD requested representatives of the Alaska Department of Education (DOE) and the University of Alaska to meet with OCR. As a result of this meeting held in April 1976, the DOE assumed a leadership role in the resolution of its problems with OCR. With the approval of the Alaska State Board of Education, the DOE entered Title VI compliance negotiations with OCR in behalf of all school districts in Alaska. The State Board of Education directed its staff to identify

and assess the primary or home language of the state's students, develop minimal guidelines for use by all school districts and prepare a timetable for the assessment, development, and implementation of a bilingual plan.

In September 1976, with the abolition of AUBSD, OCR informed DOE that it was being held in noncompliance with Title VI of the Civil Rights Act (1964) and requested DOE to submit a comprehensive compliance document detailing student assessment, programs to remedy needs of children with linguistic problems, staffing, and funding resources. DOE's efforts to develop minimum guidelines shifted to preparation of an OCR compliance document--a Lau compliance plan--reflecting the requirements of the Lau Remedies (described on page 14).

On March 6, 1977, after two sets of DOE compliance plans were rejected, OCR notified the twenty-one school districts of the official deferral of federal funds. Preparation for federal administrative hearings was quickly initiated, beginning with a prehearing conference on March 22, 1977, attended by attorneys for the school districts, DOE, and OCR.

A third compliance plan was rejected by OCR. DOE contracted with the Center for Equality of Opportunity in Schooling in Anchorage, Alaska, to develop a satisfactory plan. Negotiations between DOE, OCR, and the Center result-

ed in the publication of A Handbook for Bilingual-Bicultural Education Programs in Alaska (Handbook) which addresses Title VI noncompliance issues.[8] In June 1977, OCR and DOE reached agreement on a three-part compliance plan: the Handbook was to be adopted as state regulations (all 217 pages) by the State Board of Education; a management plan was to be adopted by DOE implementing the programs set forth in the Handbook; and a DOE/OCR memorandum of agreement was to set forth monitoring requirements. Although the management plan and memorandum of agreement were yet to be developed, the DOE began promulgating the Handbook, and the parties agreed to postpone the administrative hearings until October 31, 1977.

In June 1977, the Anchorage School District and the Fairbanks North Star Borough School District were found by OCR to be in presumptive noncompliance with the Lau Remedies. Hence, at stake statewide was approximately $19 million in federal funds;[9] pressure to settle the dispute increased.

Public hearings on the new bilingual regulations (incorporating the Handbook) were conducted from August 24 until October 5, 1977, in Anchorage, Juneau, Fairbanks, Ketchikan, Bethel, Nome, Kotzebue, Dillingham, and Soldotna. After significant adverse testimony against adoption of the regulations, the DOE resumed negotiations

with OCR. On October 12, 1977, the DOE announced that its negotiations had failed. Commissioner of Education Marshall Lind explained: "We redrafted proposed state regulations for bilingual education, following a series of public hearings. . . . OCR responded negatively. They refuse to negotiate further. There appears to be little prospective of settlement between OCR and the . . . districts held in noncompliance."[10]

The DOE proceeded to revise the proposed regulations to be more compatible with public needs and the Lau Remedies. Revised regulations were presented to the State Board of Education; Commissioner of Education Marshall Lind explained:

> We shortened the regulations from 217 pages to ten pages to make it more concise. In response to public input, we also allowed more flexibility, so the regulations are now appropriate for urban and nonindigenous groups as well as rural, Native situations. . . .
>
> What OCR seems to forget is that state regulations need to be appropriate for all 51 school districts.[11]

Marshall Lind concluded:

> We have a state law calling for bilingual education for children of limited English-speaking ability and whose primary language is other than English. The commitment to bilingual is clear, and we

> will move ahead in the area regardless of what happens in the dealings with OCR.[12]

The revised regulations were adopted at a special meeting of the State Board of Education held in Anchorage on October 22, 1977.

DOE continued negotiations with the Washington, D.C. office of OCR. In May 1978, a DOE/OCR memorandum of agreement and a management plan for bilingual programs were signed. The agreement stipulated the following critical points: (1) DOE would file semiannual progress reports with OCR, (2) DOE would provide technical assistance to school districts, (3) DOE would seek adequate funding from the Alaska Legislature to meet the compliance requirements of Title VI of the Civil Rights Act of 1964, and (4) DOE would adopt bilingual regulations consistent with the Civil Rights Act of 1964. The Agreement would be effective for five years.

As previously mentioned, although federal bilingual policy was first expressed in HEW's May 25, 1970 Memorandum, it did not specify the type of program that would be considered acceptable. In 1973, the United States Supreme Court held in Lau v. Nichols that school districts were compelled to provide children who spoke little or no English with special language programs which would provide them an equal educational opportunity; again, the question of program type

was not addressed. A remedy was to be developed among HEW officials, the San Francisco School District and a citizen's task force. This group developed guidelines (the so-called Lau Remedies) to determine whether other school districts were in compliance with Title VI of the Civil Rights Act (1964).

The impact of the Lau decision and the Lau Remedies on Alaska's bilingual education policy has been significant. The DOE and OCR negotiations resulted in a reform policy effective for the entire State of Alaska. The reform, resulting in significant changes in bilingual education requirements, primarily addressed policy considerations, not the implementation aspects of the policy.

Although the negotiations continued for approximately two years before a final settlement was achieved, OCR's intent was to create as many adequately funded bilingual education programs as quickly as possible on the assumption that Alaska Native children were subject to acute linguistic discrimination and educational deprivation. DOE's intent was to placate OCR and return to its routine activities of administering programs.

The desire to immediately implement the reformed state regulations led OCR and the DOE to overlook ways in which

rural environments differ from urban ones--differences in learning and communication styles between Alaska Native children and other non-Native children, and the diverse environmental contexts in which education occurs. Some of the initial problems encountered included: lack of Native language proficiency instruments or any other method of diagnosing and prescribing a program of instruction for students at different proficiency levels in two languages who were academically behind; absence of functional career ladders for Alaska Native bilingual teachers which recognized necessary bilingual teaching skills yet were compatible with state certification requirements; lack of meaningful involvement of parents in the programs; inappropriate adaptation of nationally accepted bilingual program models to Alaska Native languages; and insufficient bilingual curriculum materials for the various grade levels and Native languages.

Chapter II. RESEARCH METHODOLOGY

This chapter identifies the research problem, delineates the methodology utilized to conduct the investigation, and describes the context in which education programs are implemented.

THE RESEARCH PROBLEM

Given the fact that there are initiation and development problems associated with any school program, it is important to examine recurring implementation problems if educators and community members are to expect schools to fulfill their responsibilities in educating its youth. Examination of school outcomes in terms of federal program audits and comparison of student academic gains with program treatment models has not provided the kind of results needed to determine why there are differing program outcomes under a single policy. Currently, attempts to increase our understanding of social policy results are being focused on the implementation process.

Recent research efforts in social policy have focused on the relationship between the implementation process and program outcomes. Although "there seems to be a common understanding of implementation as the carrying out of policy through a program of action,"[1] it's what happens between policy announcement and policy execution that causes different outcomes. Policy analysts agree that in order to understand variable outcomes among programs initiated under a common policy, the interaction between the policy and the program must be examined in terms of certain implementation factors. In order to understand the variations among programs implemented under a single state-wide policy, it is

important to assess the policy, how it has been implemented, and the results of the programs. The question is important to educators who are attempting to understand the relationship between policy and practice for its ideological, fiscal, and administrative implications.

Alaska's bilingual policy is to provide bilingual education for underachieving children with the following language characteristics: (1) students who speak a language other than English exclusively, (2) students who speak mostly a language other than English but also speak some English, (3) students who speak a language other than English and English with equal ease, (4) students who speak mostly English but also speak a language other than English, (5) students who speak English exclusively but whose manner of speaking reflects the grammatical structure of another language, and (6) students who speak English exclusively but do not fit the last category. Given this mandate, how have schools implemented Alaska's reformed bilingual policy?

The realization that social policy outcomes are somehow linked to the translation of policy into practice has resulted in various theories as to what kinds of factors influence and ultimately shape outcomes. This case study analyzes the implementation of Alaska's bilingual education policy in the Lower Kuskokwim School District which serves predominately Eskimo (Central Yup'ik) villages. It

describes how programs are implemented, analyzes problems encountered during the implementation of programs in the District, and explains why the programs have diverged from the intent of Alaska's bilingual education policy. This study will attempt to answer such questions as: How do bilingual programs function in practice? Are the programs meeting the intended goals of the state bilingual policy? What are the implementation problems encountered in practice? Why are they problems? How are the problems related, if at all, to the concept underlying the state's policy?

THE RESEARCH DESIGN

A standard qualitative research design was utilized in this study. The three techniques outlined in Jerome T. Murphy's Getting the Facts: A Fieldwork Guide for Evaluators and Policy Analysts,[2] --intensive interviewing, transient observation, and document analysis--were employed. These techniques of data collection were triangulated to develop the most accurate research findings and interpretations. A qualitative research design was utilized because the focus of the research study was on the program participants' perspectives of the implementation process.

The primary method of data collection was intensive

interviewing to obtain information about program history, impact, and implementation, and about alternatives for improved practice. Transient observation was employed to corroborate interview data and develop additional information for investigation. Field notes were taken on the interaction of individuals relating to authority relationships, decision making processes, current issues, pressing crises, administrative styles, important actors, standard procedures and activities, attitudes toward agencies, levels of enthusiasm, and general climate. The physical surrounding of the program gave clues as to how the programs were regarded; the props surrounding the interview subjects provided clues about their background, interests, values, attitudes, and intellectual orientation. Lastly, the author was sensitive to those "unobstrusive measures" which Murphy describes as the "less obvious signals of problems or performance."[3]

Document analysis was also employed for collecting background program data relating to program goals, proposed activities, and other retrospective data, and for providing credibility to the final analysis of the program. Data was obtained from program plans, evaluations, budgets, school board minutes and reports, state program reviews, conference reports, newspaper articles, federal program plans and agreements, correspondence, and other pertinent documents

available for review.

Interview questions relating to bilingual program practices, implementation problems, and local perceptions of the program were divided into five major categories: (1) organizational and political setting, covering history, tradition, and structure of the organization, accepted procedures, training and expectations of the staff, etc.; (2) fundamental program characteristics that demonstrate how the program works, such as available resources, program cost, personnel operating and benefiting from the program, district practices and procedures, and the effect of state monitoring/auditing; (3) key individuals and institutions responsible for policy implementation, the function of these individuals and institutions, and how they exert influence; (4) program development, demonstrating how the program's goals, its impact, its participants, and its environment have changed over time, highlighting continuing issues and problems; and (5) how well the program is operating. Data from field notes and document analysis were employed to obtain additional data in these five areas.

Interview subjects included key school administrators, bilingual teachers, and individuals who were selected randomly from the following five groups: (1) school personnel working directly in implementing bilingual programs, (2) individuals and institutions external to the daily ope-

ration of the programs, (3) school board members and local advisory board members, (4) high school students participating in bilingual programs, and (5) parents of the interviewed students.

THE RESEARCH SETTING

The Lower Kuskokwim School District is located in the tundra-covered southwestern region of Alaska known as the Kuskokwim Delta. About 90 percent of its population is Yup'ik. One of the most populated Native rural areas of the state (15,126 counted in the 1980 census), it also ranks among the poorest (in 1974 the region had a per capital yearly income of $4,000 to $6,000). The cost of living on the other hand is high; a representative sample of food items in the region costs more than twice the cost in Seattle.

Bethel is located on the lower Kuskokwim River, about eighty-six miles inland from the Bering Sea. From the late nineteenth and early twentieth century, Bethel has evolved from a trading post with a population of 370 with a primarily subsistence economy into a major service and supply center for fifty-six villages. Bethel, now a second class city with a mayor-council form of government, acts as the goods and service center for the surrounding villages of

the lower Yukon-Kuskokwim region.

More than 90 percent of the region's population is Eskimo or Athabascan Indian (total of 17,000 in 1980).[4] In 1950, the population of Bethel was 650, then it increased to 1,200 by 1970. In 1979, the city had 3,900 with 65 percent of the population being Yup'ik.[5] According to a 1980 survey of the Bethel community, "one-half of those surveyed take subsistence food resources from land in Bethel."[6]

> A community lifestyle that mixes both traditional and modern activities has become a pattern for the community as a whole. An economy based on seasonal employment, coupled with the high cost of importing all fuels, materials and food, has required many of Bethel's residents to alternate between the cash economy and subsistence. Much of the cultural life of the city is based on Yupik arts and traditions. This includes the city museum, Yupik dances, and Native culture and affairs.[7]

The same survey revealed the community's attitude toward Yup'ik culture and heritage:

> Yupik cultural identity is an important component of life in Bethel, for both Native and non-Native residents; Yupik culture is rated as important by 75% of those surveyed.
>
> The main components of this identity are subsistence knowledge, bilingual skills and the general knowledge of Yupik history and customs;
>
> Gathering food from the surrounding land . . . is an important part of life in

> Bethel, and participation in these is reported by 70% of those surveyed . . . .[8]

Bethel is a bilingual community: approximately forty percent of those surveyed speak and understand the Yup'ik language. Both Yup'iks and non-Yup'iks indicated a desire to increase their Yup'ik language skills.[9]

Bethel is the regional governmental, commercial, and service center for the region.

> Approximately 50% of Bethel's income and employment is associated with the city's role as a regional center.
>
> . . .
>
> Bethel's role as a regional seat of government for federal, state and regional agencies accounts for over 50% of employment in the city. Public regional agencies . . . include the AVCP [Association of Village Council Presidents] Housing Program, AVCP Manpower Office, Yukon-Kuskokwim Health Cor-

> Bethel's role as a regional seat of government for federal, state and regional agencies accounts for over 50% of employment in the city. Public regional agencies . . . include the AVCP [Association of Village Council Presidents] Housing Program, AVCP Manpower Office, Yukon-Kuskokwim Health Corporation, Prematernal Home, Public Health Service Hospital, Bureau of Indian Affairs, Kuskokwim Community College, Lower Kuskokwim School District and the Alaska Department of Health and Social Services.

> . . .
>
> Bethel also serves as the commercial center of the region, largely based on its role as a transportation center and transshipment point for goods. Food, fuel, gravel and

> construction materials are supplied by barge from Seattle and other locations and distributed from Bethel to villages in the region. Warehouses and fuel storage tanks to serve regional demand are located in Bethel.[10]

Bethel has a limited tax base supporting a limited amount of services. It depends to a great extent on state and federal supplemental funds and assistance in providing basic community services. State supported services include education, health, welfare, road construction and maintenance, and the administration of justice and law enforcement.

Bethel has urban-like facilities. For example, it has an airport that accommodates several regularly scheduled jets daily. Private telephones, television, commercial radio, and electrical services are generally available; sewer and water are available to parts of the community while other parts receive these services through truck pick-up and delivery.

From the perspective of a visiting village resident, Bethel is a "big town" with many facilities and services. Although urban conveniences are growing, the surrounding villages are less modern and often do not have much in common with Bethel. Communication, utilities, and transportation services exemplify these differences. Instead of private telephones, most village residents rely on a single

public telephone centrally located in the village or on short-wave radio for daily communication. While sewer, water, and electrical utilities are available to Bethel residents, such services are marginal or non-existent at the village level. Bethel has seventeen miles of paved roads, while most villages have a single dirt or gravel road connecting the airstrip with the village. Residents of villages along the Kuskokwim river system drive their motor vehicles on the frozen rivers during the winter; during the spring, summer, and fall, boat travel becomes a major form of transportation. Throughout the entire region, airplanes, boats, and snow machines are the major forms of transportation.

In contrast to Bethel, village life revolves around a dominant Yup'ik population where the economy is a mixture of subsistence and cash/wage employment. According to one analysis, the economic base in rural Alaska is essentially a "collection of a number of family groups which serve as semipermanent entities partly because of their proximity to subsistence resources but also because of services such as education, health, and transportation which have been provided by State or federal governments."[11]

In most villages, few full-time jobs are available. Typical full-time jobs include the postmaster, school maintenance man, and airline station agent. Others may operate small businesses such as a dry goods store, a laundry-

shower-sauna facility, or some community related service.

> A large portion of rural employment opportunities are seasonal. The major activities providing seasonal employment, particularly for Natives, are commercial fishing and fish processing. The fishing season generally lasts from two to four months in the summer. Government is also a prime source of seasonal employment. Jobs include construction of BIA schools, construction of defense facilities, fighting of forest fires, and security services. Other seasonal opportunities can occur related to private and public transportation systems (e.g., unloading barges, constructing roads) and tourism.[12]

The delivery of educational services to villages must be understood in terms of the socio-cultural and physical environment and the infra-structures. About half of the village schools examined are located along the Bering Sea coast, while the remainder are located inland near or along the Kuskokwim River; the villages are 14 to 114 air miles from Bethel. Nine of the ten program sites examined had populations ranging from 201 to 451 persons. Often the only non-Yup'iks in the villages are the teachers (and their families) who reside there only during the academic year. Yup'ik is the dominant language of communication for children and adults in a majority of the villages. In other villages, Yup'ik is a predominant language for adults, while English (often mixed with Yup'ik words) is the predominant language of the children. A typical Yup'ik household con-

sists of the nuclear family and extended family (usually grandparents). Families live in small rectangular houses made of imported wood shipped in through Bethel.

A traditional village council or city council, or both, act as the governing body for the village. Other general community service structures include a small clinic, post office, village office (which usually houses the only telephone), one or two small dry goods stores, a Moravian or Russian Orthodox Church (or both in the same village), public laundry facilities with showers (in only a few villages), and either a combination state-supported elementary-secondary school or a Bureau of Indian Affairs elementary school with a state-financed high school. The schools are often the largest buildings in the villages. All villages have gravel or dirt airports.

Prior to 1976, the state-supported schools in the Bethel region were administered from a central office in Anchorage. In 1975, the Alaska Legislature created twenty-one new school districts. The Lower Kuskokwim School District (created by the legislative mandate) began operating as an independent school district in school year 1976-1977. The District's jurisdictional boundary encompasses forty-thousand square miles and twenty-six communities. During its first year of operation, the District operated schools at six sites including Bethel. During its second year,

three more schools were added. Today, the District operates elementary schools and high schools in twenty-three villages and Bethel.

The District's central administrative offices are located in Bethel, where elementary and secondary enrollment is the largest. The total district enrollment in the 1980-1981 school year was 1,795 students;[13] 213 high school students graduated,[14] and the District employed 180 certified teachers.[15] The District is governed by a nine-member regional school board, which in the 1980-1981 school year consisted of seven Alaska Natives and two non-Natives. The board is the final authority for all educational policy decisions; however, each village with a school has an elected advisory school board to the regional school board.

There are bilingual programs in all twenty-three villages as well as Bethel. During the 1980-1981 school year, the District identified 1,211 target bilingual students, the largest concentration being in Bethel elementary and secondary schools. The language of instruction other than English is Central Yup'ik (Eskimo) for all bilingual programs throughout the District. In the 1980-1981 school year, the Lower Kuskokwim School District programs accounted for approximately one-fifth of the state's bilingual budget.

There are twenty-four high school bilingual programs but only seven elementary programs. Of the ten high schools

examined, all offer Yup'ik literacy and culture classes with a majority of the classes treated as an elective course rather than a required course of study. In five of the seven elementary programs examined, there are two primary Eskimo programs and three Yup'ik as a Second Language programs. The primary Eskimo program (PEP) is intended for students from villages that meet the A and B language categories of the state guidelines (students who speak exclusively or predominately Yup'ik at home and school), whereas the Yup'ik as a second language program is intended for students in language categories C, D, E, and F (including students who speak some degree of both English and Yup'ik through those who speak exclusively English). PEP programs are transitional bilingual programs, while the Yup'ik as a Second Language programs are enrichment or supplemental programs. The intent of PEP is to develop functional English language users while teaching students in their Native language through third grade; the transition to an all-English curriculum is made in the fourth grade. In contrast, Yup'ik as a Second Language programs are intended as a supplement to an all-English curriculum in order to provide students with a language experience other than English. Schools with PEP also have Yup'ik as a Second Language programs. Where PEP is offered, parents and advisory school board members assume that school can begin no other way; parents and advi-

sory school board members selecting a Yup'ik as a Second Language program determine whether it should be mandatory for all students, an elective, or a mixture of both.

Chapter III. IMPLEMENTING BILINGUAL EDUCATION REFORM IN THE LOWER KUSKOKWIM SCHOOL DISTRICT

This chapter describes bilingual reform goals and local program implementation. Although the focus will be on three program approaches and on local implementers' perspectives of the implementation process, the information and data utilized is a composite of the research conducted in ten Lower Kuskokwim School District bilingual program sites.

BILINGUAL EDUCATION REFORM GOALS

A brief discussion of the state's reform goals and the Lower Kuskokwim School District's goals provides an understanding of how their goals interact with local implementers' goals and intents.

The Lower Kuskokwim School District's goals are developed according to the purposes outlined in the state's administrative regulations. One program planner at the District's central office outlined the following bilingual edu-

cation goal which was presented to the regional school board during the 1980-1981 school year:

> Encourage the retention of Yupik culture and language and adapt this knowledge to present day living. Assist the students to become bilingual and literate in both languages and furthermore to be able to adequately function in the language used for instruction in the educational program. A child should be assisted in learning subsistence skills for his particular area as well as technical skills that will help him to augment the subsistence way of life. He should learn to adapt to the changing way of life while still retaining his language and cultural activities, and take advantage of any educational opportunities made available to him.[1]

These goals are consistent with the state's reform goals (established through negotiations with the Office of Civil Rights) of meeting the special needs of children of limited English-speaking ability through bilingual-bicultural programs of education. The language dominance categories set forth in the state bilingual regulations exceed the Lau Remedies in one language category, namely "students who speak English exclusively but whose manner of speaking reflects the grammatical structure of another language,"[2] often referred to as language interference. The state regulations require program activities in six areas: parent community involvement, curriculum/instructional, materials development, staff development, district program management schedule (implementation), and evaluation. The regulations

state that "category A and B students at the primary and intermediate level" must be provided a program that includes a "bilingual/bicultural curriculum" or a "transitional bilingual/bicultural curriculum."[3] Students in the same categories at the secondary level have three options: a "bilingual/bicultural curriculum," a "transitional bilingual/bicultural curriculum," or a "high intensity language training curriculum." Students in categories C and D at all grade levels have four options: a "bilingual/bicultural curriculum," an "English as a second language curriculum," a "supplemental English skill and concept development curriculum," or a "language other than English as a second language curriculum." Lastly, students in category E at all grade levels have three alternatives: an "English as a second language curriculum," a "supplemental English skill and concept development curriculum," or a "language other than English as a second language curriculum."[4] Beyond these program alternatives and their limited definitions, the regulations provide no other information regarding specific program activities; there are no blueprints in terms of how one curricular offering is similar or different from another.

Both federal and state goals aim to rectify education inequities and to promote equal educational opportunity through alternative methods of instruction for students

whose primary language is other than English. The state goal embraces additional objectives:

> Provide more effective use of both English and students' language, foster more successful secondary and higher education careers, facilitate the obtaining of employment, tend to bring about an end to the depreciation of local culture elements and values by the schools, stimulate better communication between the community and the schools in solving educational problems, effect a positive student self image, allow genuine options for all students in choosing a way of life, and facilitate more harmonious relationships between the student's culture and the mainstream of society.[5]

The reform measures represent compromises between proponents of bilingual programs and those that oppose highly specified rules and guidelines concerning curricular offerings and local school operations. The reformers hoped that schools would create positive relationships between teachers and students, alter curricula by incorporating local cultural elements, increase parent-community participation in the schools, and increase student academic achievement through a program of instruction that students understood. As in many other federally initiated programs, the reformers have multiple goals for bilingual education.

However, after local program plans were designed, submitted, and approved for implementation and funding by the state, plans had to be redesigned at the local level. Those implementing the programs began to interact according to

their own assumptions and intentions as to program purposes. There were diverse levels of technical expertise in bilingual education. The perceptions of the various implementers varied depending upon their roles in the implementation process.

LOCAL PROGRAM IMPLEMENTATION

Program observations and interviews conducted in ten locations reflect essentially three approaches to program development, each demonstrating different purposes and problems, each reflecting diverse roles, goals, values of local implementers, and levels of support for the programs. Differences among the three illustrate the divergent and often contradictory perceptions of program goals and purposes. Although the approaches differ, the underlying purpose of each approach is to maintain Yup'ik language usage. Each approach responds to the varied and unique environment of the community and its language characteristics. In spite of the many problems encountered, the programs are deemed a success from the local perspective, because they reflect aspects of community needs and aspirations.

The remainder of this chapter describes the three approaches[6] to program development found to exist in the District and the various perceptions of the programs and

problems encountered.

Transitional enrichment program approach. The primary Eskimo program (PEP) pre-dates the Lower Kuskokwim School District (1976) and has operated with very little change, while other parts of the program for grades four to twelve were developed in 1976 and maintained as an enrichment course or as just another course of study. Enrichment courses were established to comply with the state's Lau compliance agreement with the Office of Civil Rights.

PEP follows a transitional bilingual program approach for grades kindergarten through three, while grades four through twelve follow an enrichment program approach. Kindergarten students are taught exclusively in Yup'ik with one class in English; however in some instances, English may not be a component of the program, because parents deem it unnecessary or prefer that Yup'ik be the only language of instruction. Students in the first, second, and third grades have academic subjects taught in Yup'ik: first and second graders have one class (about forty to sixty minutes) of special instruction in English as a Second Language, while third graders have two classes (which is still equivalent to about sixty minutes) that cover English grammar and reading. A team approach to teaching students in kindergarten to third grade is employed; the team includes two to

three bilingual, uncertified Yup'ik teachers, a shared bilingual aide, and a half- to full-time non-Yup'ik teacher for English as a Second Language (ESL). One bilingual teacher explains the teams' efforts to work together: "We meet once a week with the ESL teacher to discuss curriculum areas taught in English and Yup'ik. We try to coordinate our teaching efforts."[7] Academic subjects in the first through third grades are taught first in Yup'ik, then a week later concepts previously learned in Yup'ik are repeated in English as students learn English. Students are grouped homogeneously according to grade levels rather than ability or interest level (in PEP). However, depending on the student population by grade, it is not uncommon for two grades to be combined.

The ESL portion of the program emphasizes English communication skills. ESL curriculum content is based on a master book that outlines activities for reading, math, science, language arts, social studies, health, and phonics for grades one through three. Similarly, the Yup'ik portion of the curriculum is controlled by a master book and a resource book utilized by each Yup'ik teacher. The curriculum content encompasses Yup'ik instruction in grammar, language arts, social studies, mathematics, science, health, creative art, and music. The content of the curriculum emphasizes local subsistence activities, environment, and

history. The utilization of local flora and fauna is an essential aspect of the curriculum content. Also, local resource people occasionally provide information or presentations for Yup'ik classes. The master curriculum book and the resource book contain detailed recommended activities for each school day with a variety of suggested alternate activities. Bilingual teachers in PEP generally follow the curriculum guides with some deletions or modifications as they deem them to be appropriate.

Yup'ik reading and writing are taught in the first three grades, despite a limited amount of Yup'ik reading material for students. Thus, opportunities for reading in Yup'ik are limited, even if students are able to increase these skills. The flexibility of bilingual teachers is frequently constrained by tight scheduling of classes and their desire to meet annual curriculum goals. ESL and bilingual teachers have their own classrooms or designated areas. At one program site, a bilingual teacher conducts classes in the main building, while the other bilingual teacher holds classes in a separate building due to a lack of space in the main building. According to the teachers, this arrangement does not present any problems, except they recognize that it does reduce inter-faculty communication. At another site, classrooms are shared with partitions dividing necessary space for each teacher.

According to Yup'ik and non-Yup'ik teachers, the enrichment portion of the bilingual program that serves grades four to twelve is intended to maintain Yup'ik language usage. The fourth grade is the transition point: students taught in Yup'ik in kindergarten through grade three shift to an all-English academic curriculum with one hour of Yup'ik in social studies-science. Generally, all students in grades four through eight have Yup'ik as a supplemental course of study while students in grades nine through twelve have Yup'ik as an elective course. Non-Yup'ik certified teachers instruct the academic portion, while the Yup'ik bilingual teachers (either PEP or additional Yup'ik teachers) instruct Yup'ik language courses for grades four through twelve. For example, at one program site, one bilingual teacher instructs kindergarten, first, and fourth through eighth grades as well as a physical education class for grades one through three, and the other Yup'ik teacher conducts classes for second and third grades and two high school courses. At another site, two additional Yup'ik teachers are employed, one to teach grades four through eight, and the other grades nine through twelve. For grades four through twelve, there is little academic collaboration among the Yup'ik bilingual teachers and the non-Yup'ik teachers. Yup'ik aides serve the Yup'ik bilingual teachers in various capacities; according to the

district's central office, the ideal role and function of these aides is to assist students and staff, particularly in those situations where there are communication difficulties.

Enrichment Maintenance Program Approach. Another program approach operative in the Lower Kuskokwim School District is an enrichment maintenance program at the high school level. In this approach, fluent Yup'ik speaking students continue their study of the Yup'ik language as a supplemental course at one or more grade levels (nine through twelve). The Yup'ik language is viewed as the primary language of the students and the community, with English as the second language. A majority of the students belong to language category B contained in the state regulations, i.e., students who speak mostly a language other than English but also speak some English.

Although high school Yup'ik language classes are not mandatory District policy, usually all students participate in the classes at one time or another. Advisory school boards determine the extent of required Yup'ik instruction, i.e., content and duration of the program. It is in this program approach that local control plays an important role in terms of the nature and extent of the Yup'ik language activities. As one teacher explained, "At the dis-

trict level it is not mandatory. . . . At the village level, advisory school board asked that it be an option offered every semester."[8]

At one program site, four Yup'ik language courses are offered; students are grouped according to grade levels, e.g., freshmen have Yup'ik I, sophomores have Yup'ik II, etc. The courses are taught by two uncertified Yup'ik bilingual teachers. In addition, an Alaska geography-history course is taught bilingually in both English and Yup'ik. Each class takes forty-five minutes per day. Other academic subjects are taught in English with the assistance of two bilingual teachers; additional aides assist in English, math, science, health, and Title I (ESEA of 1965) classes.

At other enrichment maintenance program sites, the advisory school boards require students to take one or two years of Yup'ik during high school. Of all the "required" enrichment maintenance programs, one bilingual program appeared to be quite popular with students and positively accepted by teachers and parents. The program consisted of four levels of Yup'ik and an Alaska geography-history course taught by a bilingual teacher and aide. Both courses were integrated into the regular curriculum, and the Yup'ik language course was directed toward maintaining Yup'ik language usage. All teachers and parents interviewed spoke highly of

the bilingual teacher and felt the bilingual program courses were important to the students' educational experience. Similarly, the students reported their satisfaction with comments suggesting greater understanding of the Yup'ik language and their Native regional corporation. During the 1980-1981 school year, the bilingual teacher was selected by students as the most popular and admired teacher in the school. According to central office staff and other local language experts, the bilingual instructor at this particular site is a very capable teacher because of his extensive bilingual education experiences and bilingual training.

Instructional methodology for these programs tend to focus on communication skills, utilizing oral and written exercises and activities; literacy is stressed in all Yup'ik classes. Students are introduced to "local usage differences": some words are pronounced and written differently throughout the Yukon-Kuskokwim region (but are still understood by all Yup'ik speakers). Curriculum guidelines and activities for each Yup'ik course are developed by the bilingual instructor; if there are two instructors, usually the more experienced one develops the curriculum content. Each of the Yup'ik programs have varying scope, sequence, and course content appropriate to the various grade levels, so that there is a progression from elementary or beginning Yup'ik to advanced Yup'ik. The curriculum variations depend

on the past experience, training, and goals of the bilingual teachers.

Enrichment Restoration Program Approach. A third bilingual approach found in the Lower Kuskokwim School District is an enrichment restoration program. This is a supplemental, optional second language course directed toward non-Yup'ik speakers (many of whom are of Yup'ik ancestry).

The enrichment restoration program approach has operated in parts of the Lower Kuskokwim School District longer than the other program approaches, not so much by choice but rather due to a change in jurisdictional responsibility for the schools: many of them, especially elementary schools, were within the jurisdiction of the Bureau of Indian Affairs but recently have become part of the state public school system. During the 1970's, village communities were given the option to choose which governmental system would be responsible for local education. Schools coming within state jurisdiction became subject to the same state and federal laws as any other public institution and, accordingly, initiated bilingual programs according to the state mandate.

The enrichment restoration approach to bilingual education is a Yup'ik as a Second Language program, offered as an elective course for kindergarten through twelfth grade. A majority of the students in this program approach have been

identified as being in state language categories C, D, E, and F; a few of the students fit in category B. According to state regulations, the District is required to provide one or more of the following options unless a variance has been granted by the state Department of Education: a bilingual/bicultural curriculum, an English as a second language curriculum, a supplemental English skill and concept development curriculum, or a language other than English as a second language curriculum for all grade levels.

At the elementary levels (kindergarten through eighth grade), students attend Yup'ik language classes for approximately thirty minutes per day, while about fifty-five minutes per day is allotted to the secondary level elective classes. Academic subjects such as math, history, and science are conducted in English for all grades (kindergarten through twelfth). Kindergarten through eighth grade students are divided into small groups, depending upon the school schedule and student population, while the high school course is generally taught by a single Yup'ik instructor.

Like the bilingual teachers in PEP, Yup'ik teachers in the enrichment restoration bilingual programs are not certified teachers. Unlike PEP teachers, they work as isolated independent units and have little interaction with other certified teachers with whom they share students. Bilingual

aides work with bilingual teachers and function as substitutes when the bilingual teacher is unavailable. Yup'ik classes are treated much like a foreign language offered to non-Yup'ik speakers, but Yup'ik classes are neither integrated with the school's activities nor with its language department if there is one. Students are grouped by grade levels rather than by language ability. Several grades may be combined in order to accommodate all students who have registered. Parents of elementary students are informed of the supplemental Yup'ik class and are requested to advise the school of their child's choice. While students attend their Yu'pik class, students not participating in Yup'ik remain in their regular classrooms. At one high school program site, Yup'ik has received little student interest as evidenced by decreasing student enrollments since 1978. In the opinion of some District staff, the decrease may be attributed in part to former boarding students now attending local village high schools, to the attitude that Yup'ik is not a viable language, and to the fact that the bilingual instructor is not encouraging student enrollment or creating the necessary interest. At the same site, the six high school students currently (1980-1981) enrolled in the class receive individual instruction as well as group instruction. Mixed ability grouping is not a serious problem because of the low enrollment; if high school classes were

large, e.g., twenty to thirty students, variable language abilities could become a problem for group instruction.

At the elementary level, instructional methodology focuses on oral language development and practice through games, songs, oral story telling, poetry, dancing, art work, and minimally patterned practice drills. Simple communication skills are emphasized rather than literacy skills. Although literacy skills are introduced, students are not exposed to extensive Yup'ik literature; Yup'ik reading and writing skills at all grade levels are minimal. Until recently, bilingual teachers, particularly in the elementary grades, have had no appropriate curriculum materials except those made by themselves. During the 1980-1981 school year, some curriculum materials were being developed, referred to as the WRRC materials, which are general guidelines for teaching concepts in Yup'ik. Unlike the PEP curriculum guide, these guidelines are not a step by step program of activities with extensive options; instead, they list instructional activities within broad curricular concepts. The bilingual teachers use the WRRC guidelines with modifications and adjustments; restructuring ranges from changing elements and sequences of the curriculum to deleting inappropriate elements.

The district office program director asserts that "the most difficult problem is no materials."[9] One reason that

there are so few materials lies in the difficulties encountered in attempting to develop one set of materials for differing situations. For example, the initial materials developed by WRRC were "too easy" for village students, while the same materials were "too difficult" for non-village students. The director notes: "So we try to add flexibility for teachers, but teachers can't adapt materials due to their limited abilities. Even to adapt the literacy part, some don't have a high literacy level to adapt materials."[10] This seems to be particularly true in the enrichment restoration programs; these teachers appear to require more guidance in developing program goals, curriculum materials, and instructional methodologies compared to bilingual instructors in the other two program approaches.

Scheduling Yup'ik language classes did not appear to be a problem for the elementary level bilingual programs, since classes were conducted every day of the week. However, at several high school program sites, bilingual teachers reported scheduling problems. Not all students were able to participate, because they were required to be either in a Title I class or in some other elective class being offered concurrently with the Yup'ik course. Although the District superintendent "consider[s] bilingual to be an integral part of the school,"[11] bilingual teachers feel that their exclusion from the scheduling process represents a lack of com-

mitment or interest in their programs. One teacher states: "Seems my Yup'ik class is still a separate class, because I'm not a part of the process for developing the schedule of classes."[12]

Village classrooms are often small. Typically, high school classroom space is shared among all faculty, while at elementary levels, bilingual classes are held in separate areas. At the largest elementary school observed, the kindergarten through second grade classroom is in the main school building, while grades three through eight are divided between two rooms, one in the main school building, the other in an old building without running water or bathrooms--frequently without janitorial maintenance.

Although each program approach described is implemented differently, each suffers from the lack of adequate bilingual education training for both Yup'ik and non-Yup'ik teachers; inadequate materials, especially for literacy development; lack of clear instructions regarding the PEP student transition from Yup'ik to English instruction; lack of clear goals and direction for the diverse program requirements dictated by the students' language needs; and lack of criteria for measuring success. In practice, the program approaches suggest that program activities depend on the students' language situation; the bilingual education experience and background of the teachers and principals;

and the social, cultural and political context of the community.

Teaching Staff Perceptions. Teachers play a critical role in the implementation of rural education programs in Alaska. They are the primary means for introducing and, often, institutionalizing educational innovation. The different perceptions among teachers regarding the bilingual program affect its design and execution. Many non-Yup'ik teachers view the program as an important and integral part of the daily process of educating students. They explain that it's difficult to separate the bilingual program from other curriculum, because bilingual activities occur daily throughout the school, and dual language use is not to be discouraged, indeed encouraged by the use of bilingual aides to assist in communication matters.

> It's [the bilingual program] an integral part of the school because it's part of each students' curriculum each term and we, certified teachers, agree it's important.[13]
>
> The bilingual program is an integral part of the school. The program is continued through all levels and plays a certain role in all subjects taught and makes certified teachers aware [that Yupik is employed] to supplement the English language curriculum.[14]
>
> It's the reality of dealing with a bilingual school.[15]

A similar view, held by some non-Yup'ik teachers, was that the program did not go far enough: Yup'ik should be emphasized more throughout all grades--perhaps half a day of Yup'ik and half a day of English; to provide relevant education to village students, it must address and involve the daily problems of village living which includes effective Yup'ik language usage. Although aware of the theory that bilingual programs retard the intellectual development of students in English, the teachers felt that if students utilized both English and Yup'ik at an early age and continued dual language learning, students would not fall behind in school. The teachers' experiences indicate that when information is translated into Yup'ik, particularly at the high school level, students have fewer problems understanding complex concepts. They can spend ten to fifteen minutes explaining a concept to students in English without success; a bilingual teacher or aide who explains the concept effortlessly in half the time with far greater success.

Most bilingual teachers view the program as an opportunity for personal and professional growth, as well as a legitimate method for contributing to community education needs. For example, some bilingual teachers have been involved with the District's program since its inception because of their desire to work with children in their community. The opportunity for stable employment in a com-

munity environment conducive to their personal and professional growth is an important incentive for their continued relationship with the school's program.

> I thought it was a good opportunity to teach using my language and made me think I would be teaching children. I thought the job would be beneficial to the kids and not just to me. It is also a stable position (a good job). Also, it provided a chance to stay in the village to help the people.[16]
>
> When I was in school I was slow in learning because of language differences. Now I know bilingual education helps a lot, and the kids can learn faster by using two languages.
>
> I enjoy teaching. I like it because I enjoy the students and I enjoy helping them.[17]

Other non-Yup'ik speaking staff explain that their role as instructors of English provide them with new teaching opportunities--a challenging role in educating elementary students. They feel teaching English to Yup'ik dominant children is visibly rewarding: after only half a year of teaching English, results were apparent. This is not to say that the students had become proficient in English, but rather that progress was definitely visible. Students developed English vocabularies and learned simple sentences at the elementary level (kindergarten through third grade). On the other hand, teachers at the junior and senior high school levels found students' English language capabilities to be severely lacking, interfering with intellectual devel-

opment in other subject areas. They spent more time on teaching English skills and less time teaching other important subjects.

Some non-Yup'ik teachers have a strong desire to assist in the development of a truly bilingual maintenance program with their own roles diminishing as certified Yup'ik teachers from the community take their place. In an attempt to address problems associated with bilingualism, some teachers have designed or redesigned the all-English portion of the curriculum so that it complements the Yup'ik program, particularly at the elementary and junior high school levels; teachers indicated that they could do more if the central office provided additional advice and direction. Part of the problem at the village level is related to lack of knowledge: "I don't have a good idea as to how my portion [ESL] is supposed to function."[18]

Many Yup'ik bilingual teachers and certified non-Yup'ik teachers in all programs expressed frustration in trying to develop language competencies in Yup'ik and English. They cite a variety of reasons, ranging from a lack of teaching materials, inadequate understanding of program goals and expected results, and inadequate professional preparation for teaching in a bilingual school; others cite a lack of appropriate teaching guides and materials at the various grade levels, particularly for students learning Yup'ik in

the enrichment maintenance and restoration programs.

> To teach four years of Yupik . . . is difficult due to limited materials. Although there are more materials, it's not comparable to English [curriculum materials].[19]

Elementary grade Yup'ik teachers express their problems as a lack of curriculum guides and materials and the need for additional staff.

> One thing I don't understand is what we are suppose to do from grade to grade. For example, I let the seventh and eighth graders use the micro-records, because I don't know what else to do . . . . What to teach at different grade levels has been difficult. Also, there is such a variation in abilities in one grade group that thirty minutes is insufficient time for individualization.[20]

> Too many students and not enough staff. [Mixed ability grouping] is difficult to deal with effectively. For example, in one class there are non-Yupik speakers, some that can understand but can't speak Yupik, and some that can understand with limited vocabulary and verbal skills. We really need teachers for each group.[21]

A central officer administrator acknowledges the need for additional curriculum materials:

> It has been frustrating to develop programs . . . . It's a lot better now but not ideal. It's still very frustrating, because there's not enough materials. For example, this is one reason there is a lack of interest in the [enrichment restoration program approach]. Also, bilingual staff are not treated as professional staff. Some feel what they are doing is not doing any good.[22]

Almost all bilingual teachers involved in the various programs have restructured, changed, modified, even deleted the few program materials available which they considered inappropriate for program needs. For example, materials recently developed by consultants are not being used in the transitional enrichment program (PEP), because the instructors state that the materials have to be reviewed and analyzed to determine their "fitness." Nor are these materials being used in high school enrichment maintenance programs because the materials are "too elementary" for the students. Teachers contend that field-testing materials takes time away from the established curriculum, and students complain about the interruption in their regular Yup'ik lessons. District office administrators recognize that the materials may be too easy or inappropriate for particular programs; they do not expect the schools to implement these materials. If any of the materials are implemented, it will probably be those parts that can be integrated into existing program activities.

Another group of Yup'ik and certified non-Yup'ik teachers cite a lack of adequate program specification as the primary cause of their frustration in implementing the programs. Teachers desire greater overall specification and guidance in terms of curriculum, teaching methods, and directives relating to the goals and objectives of the pro-

gram. Teachers in the enrichment program approach state:

> The bilingual program and the whole school suffers from lack of guidance from the district level.[23]
>
> I have no knowledge about LKSD's bilingual goals, except that we must get the students to learn all the words in our lessons.[24]
>
> It would be helpful if [central office] gave more directions to the principals, teachers, and bilingual teachers.[25]

Teachers in the transitional program (PEP) have specific problems relating to reading, English comprehension, and the transition from Yup'ik to English curriculum. Comments by some teachers indicate that there is little interaction between the various program sites and the central administrative offices.

> A major shortcoming when the bilingual program was designed is that there's no reading program for it. The present reading program emphasizes phonics. So in spelling and reading out loud they are very good, but the bilingual reading program doesn't emphasize comprehension. Thus, when I get them in reading, it is tough to obtain good comprehension.[26]
>
> The switch at the third grade is too abrupt and quick. There needs to be more coordination between the subject areas with Yupik in grades one to four.[27]

Some of these teachers recognize the limited opportunities for students to practice Yup'ik speaking and writing skills in grades four to eight with an all-English curriculum

taught by non-Yup'ik teachers. Similarly, at the high school level, the emphasis on English limits the opportunities for continued Yup'ik language development. For example, opportunities for translating academic course material either orally or in written form are rare. Thus, the perennial question of "how much Yup'ik and how much ESL?" concerns teachers attempting to reach a balance in achieving dual language proficiency. Most non-Yup'ik teachers agree that both English and Yup'ik are desirable, but due to their lack of experience and knowledge of Yup'ik bilingual programs, they feel the central office ought to provide greater guidance, particularly by clearly specifying the transition from a Yup'ik to English curriculum.

Still another group describes their problems in terms of inadequate training to teach in a bilingual situation, particularly where the communities' dominant language is Yup'ik. Two subgroups emerge: Yup'ik and non-Yup'ik teachers, each with different training needs. Both of these teachers agree that more should be done to improve program effectiveness--specifically, more training.

Formal teacher training efforts have been beneficial for bilingual teachers. It has informed them of teaching methods, improved their general knowledge of the subjects taught in Yup'ik, and developed their self-confidence.

> I can present lessons better with more knowledge in approaching lessons and with different teaching methods.[28]
>
> It has helped to develop confidence in our own skills and abilities.[29]

Bilingual teachers indicate a need for additional training in the following areas: methodologies for teaching Yup'ik reading and the natural sciences, theory and practice of curriculum development, and effective classroom management practices. They also suggest that future teacher training consider the following three elements: practice teaching with clinical supervision, selecting course instructors who are not so ethnocentric in their presentations, and increasing contact time with the instructor of record (as opposed to his proxy).

> Change to make semester classes longer rather than shorter. Subjects are taught too fast . . . . Instead of a facilitator, I would like the real instructor to come. We don't get proper instruction with a facilitator.[30]

Similar requests for teacher training are made by non-Yup'ik teachers who are eager to make education a more interesting, motivating, and challenging experience, primarily in the transitional and enrichment maintenance approaches. These teachers typically are in communities where Yup'ik is the predominant language; their problems stem from inadequate

knowledge about language learning and the language differences that contribute to second language learning.

> The kids aren't very expressive in either language. Our [teachers'] big failure between English and Yupik is writing is different. [For example,] how are Yupik sentences and paragraph structuring different from English?[31]

A few teachers have an out-of-print pamphlet entitled "Teacher's Guide for Teaching English to Native Children" which informs them of some of the differences between the Yup'ik and English languages. They suggest that each certified teacher hired by the District receive a copy of the pamphlet, because it's frequently reported that students are learning Yup'ik but not English. English courses need to be refined for both elementary and secondary students.

> We need a stronger English program. We are doing better in the Yupik program than in English presently.[32]

> Students aren't functional in English outside the village and Bethel. I can pick out about five kids who are functional. Lack of English would prevent them from getting jobs.[33]

> A real problem is to get them to use English, because they are surrounded by Yupik speaking kids and people. And there is no plan to train fourth, fifth, and sixth grade teachers for English as a Second Language which is really needed. There needs to be an inservice for English as a Second Language techniques.[34]

Some teachers attribute English acquisition difficul-

ties to characteristics of the Yup'ik language. Use of traditional teaching methods to overcome these characteristics has met with variable success.

> In English, the problems are traced to Yupik language characteristics. For example, sexual pronouns she and he are confused, indefinite prepositions don't exist in Yupik, irregular verbs don't exist. In Yupik, verbs are uniform. We try to remedy these problems by appropriate instructional techniques, for example, work on increasing vocabulary, or work on verbs or prepositions.[35]

> English as a Second Language addresses these [improper English usage] problems with drills. I don't know if drills help. I still see and hear high school students use the wrong pronoun (she-he).[36]

Some teachers report that increased training in Yup'ik language and culture would facilitate their teaching Yup'ik students; an understanding of the students' background (Yup'ik communication techniques, values, customs) is important to effective teaching. This knowledge could alter their teaching methods and increase student comprehension and ultimate achievement. It has been suggested that collaborative teaching efforts between certified teachers and bilingual teachers and aides would be effective.

Problems encountered in teaching English stem not only from language differences but also cultural differences. According to one teacher:

> The main problem is expression. To express they are afraid to make mistakes. I think it's cultural. When you pick on students to respond singularly it is abysmal. It's cultural not to advance information like westerners do.[37]

The same teacher notes a difference in instructional approach used by Yup'ik and non-Yup'ik teachers. Positive and negative reinforcement tied to learning differ between Yup'ik and non-Yup'ik cultures; many of the teaching methods employed by Non-Yup'ik teachers are counterproductive as a result of these cultural differences. A successful bilingual instructional method does not attempt to change the traditional Yup'ik mode of learning.

> The program isn't conceived to culturally change kids at all. For example, the way [the Yup'ik teacher] operates in class in eliciting responses. He teaches different than the way I have been trained. The traditional Yupik way of learning is observation. [He] writes the correct answer on the board without telling anyone they are wrong.[38]

Another high school teacher attributes the different English language skills of students to the relationship developed between teachers and their students.

> Most students here fall below grade level in English. The gifted [students] seem to be good in English and above grade level and seem comfortable in English. Comfortable meaning they're expressive in English, vocabulary and grammar are used correctly, they interact spontaneously without delay. A lot of it is feel-

ing confident in using English and confidence in the teacher.[39]

A small number of teachers consider the bilingual program as a vehicle for achieving non-bilingual goals. One teacher felt the program provided an opportunity to teach at the elementary level. Several felt the program served a political purpose: it enhanced public relations between the central office and the school's Yup'ik constitutents. Still another group viewed the program as a waste of time and money; they assert that the program interferes with regular classes. One bilingual teacher reported that the attitude and behavior of other non-bilingual teachers and the principal contributed to her desire to resign. There was little interaction or staff support for her program; "They just don't care about Yupik."[40]

In theory, the three approaches to bilingual program development are a success. Although most observers and participants in the enrichment restoration program approach agree that such approach does not enjoy the same amount of "success" as the other two approaches, program designers consider it a success from a political perspective: each new program develops politically within the community's unique language and socio-political contexts. However, in practice, a balanced learning experience is not being realized, because both Yup'ik and non-Yup'ik teachers emphasize only their portion of the education agenda. The result

is that students do not become equally proficient in two languages. Students learn through non-verbal communication cues which language is important; as previously stated, students spend less and less time in Yup'ik language classes as they progress from kindergarten through twelfth grade.

The District's general plan is designed to be flexible with few explicit implementation directives; it encourages local program development for students in A and B language categories. The plan sets forth the following objectives for schools with eight or more students in kindergarten through third grades participating in the transitional enrichment program approach (PEP).

> Students will learn basic educational concepts and skills in their dominant language;
>
> . . .Students will acquire and maintain skills in the Native Language and use those skills whenever needed for understanding concepts that are not grasped in English.
>
> . . .Students will learn the English vocabulary for concepts they have learned in Yupik.
>
> . . .Students will learn from an integrated and articulated curriculum with appropriate content based on local needs.
>
> . . .At least one (1) certified teacher from each site will receive training in ESL [English as a Second Language] strategies and will dissiminate [sic] information so acquired to other staff members.[41]

The expected outcomes for these objectives include:

> Acquisition of basic educational concepts
>
> Acquisition of Native language skills
>
> Acquisition of skills necessary for transition into curriculum taught in English
>
> Students will develop positive self-image
>
> Participating students will show increased gain in language arts as measured by language arts component of CTBS [California Test of Basic Skills].[42]

According to some non-Yup'ik teachers, a key problem is effective implementation of the third expected outcome. English reading skills and language comprehension, whether written or spoken, are frequently below expected grade level and affect students' ability to learn academic concepts and skills. Bilingual teachers explain that students may seem to progress slowly academically because they are constantly mentally translating information from English to Yup'ik then from Yup'ik to English. The bilingual teachers say this is natural, because English is a foreign language to the students; non-Yup'ik teachers must recognize and accept this fact. Even if non-Yup'ik teachers reach this level of understanding, they do not know how to address the problem; they look to the District office for guidance. In the absence of guidelines or directives, some local program implementers fill the void with a variety of solutions, such as teacher-developed, high-interest, low-vocabulary reading

activities; and additional English language-patterned practice drills. Others continue to employ traditional reading practices.

Students categorized as A or B who are not in a PEP program have two alternatives, depending on whether they previously participated in PEP. The 1980-1981 District's Plan of Service provides:

> For a school with eight or more A or B students, the District will provide a program for maintaining Yupik Language Skills in grades 4-12 for students who have participated in P.E.P.[43]

This is the only documentation which states that a Yup'ik language course is required where a PEP exists.

> For all A and B students exclusive of those covered in [the above alternative], the local ASB [Advisory School Board] will determine whether and to what extent a Yupik language course will be available.[44]

This option allows each local advisory school board where a PEP does not exist to determine the need for a Yup'ik language course. However, in practice, all advisory school boards decide whether or not to have a program.

Both alternatives allow schools to establish an enrichment maintenance or an enrichment restoration program. Because expected outcomes are not specified for either alternative, local implementers (teachers, parents, and

principals) determine what program should be implemented and how. The District office does expect a school to use specific materials, e.g., a Yupik Eskimo Grammar book, a Yupik Orthography book, or other materials developed by consultants. The second program alternative mentioned above has no planned activities outline; local implementers are permitted to determine what to do and what the results ought to be.

Whether or not a program is established, the District's plan requires:

> All A and B students will be assisted in required subject areas by the availability of bilingual aides or instructors.[45]

For students that do not participate in the PEP program, the plan notes:

> Each ASB [Advisory School Board] will determine for its school whether and to what extent a Yupik language course will be offered to C, D, E and F students.[46]

The intent of these ASB initiated programs is to increase the oral and literacy skills of participating students in kindergarten through grade twelve.

The flexibility of the District's plan encourages adaptation; it presents opportunities for local involvement in program development. Many interpretations are permitted as to the ultimate program design. However, the varying

perceptions of the local participants all reflect continued Yup'ik language usage while learning English. Individuals become frustrated with program results if these perceptions are not realized.

The flexibility permitted by the District plan increases the chances that local interpretation will vary from individual to individual and school to school. Consensus on goals becomes more difficult to achieve, particularly considering the independent nature of individuals working in remote village schools. Recent state regulations have increased local control at the village level and accelerated decentralization of decision making. A "highly decentralized" and "highly segmented" system of school operations has been created in the Lower Kuskokwim School District.

Administration and School Board Perceptions. Other important actors in the implementation process include the principal, central administrative staff, and school boards (both the regional and local advisory boards). However, school administrators and school boards are more concerned with management issues, fiscal accountability, and general overall school maintenance problems than with the day-to-day implementation of educational policy. Among the current issues consuming the time and efforts of the administrative staff and regional school board are the Bureau of Indian

Affairs' proposed transfer of thirty-eight schools to state jurisdiction, twenty of which are within the Lower Kuskokwim School District; a pending lawsuit for $18 million involving school construction cost overruns; and housing for teachers throughout the District.

As an example of shifting priorities at the administrative level, after the state Department of Education and Office of Civil Rights reached consensus on a memorandum of agreement, the superintendent's major responsibility became the construction of twenty village high schools. These construction projects deprived him of the time needed to attend to his educational responsibilities. Effective for the 1981-1982 school year, the superintendent has revised the organizational structure of the central office to allow more time to be spent on an integrative approach to curriculum development activities and instructional delivery.

The superintendent states that continuing problem areas include "lack of [bilingual] curriculum materials . . . true acceptance of bilingual education by non-Yup'ik staff . . . more leadership at the District level."[47] While recognizing these needs on the one hand, the superintendent also notes the political considerations: "the regional board has never said what they want to accomplish with bilingual programs.

Therefore, the goals are not specified. We leave that up to the local school boards."[48]

Unlike the regional school board, advisory school boards are actively involved with the programs. Advisory school board members at all program sites support bilingualism in various degrees, primarily because they want students to retain use of the Yup'ik language and to understand Yup'ik culture in the context of social and cultural change.

Some advisory school boards view the bilingual program as an integral part of increasing academic skills.

> I see bilingual education as a way for students to comprehend concepts taught in English where Yupik is used to explain English concepts and ideas.[49]
>
> We need the program for people to learn here. When most kids start school the kids speak mainly Yupik.[50]

Supporters of this perspective suggest that the program contributes significantly to the cultural identity of students and is a critical factor in producing more effective community members.

> Without the bilingual program the school would be different. The school would be oriented toward an English only curriculum.[51]
>
> Learning Yupik values and customs is the main goal [of the program].[52]
>
> No more Yupik education . . . might result in the loss of identity among students.[53]

Some advisory school board members report that the bilingual program increases school attendance and prevent student dropout by providing culturally and linguistically relevant course offerings. Other advisory school boards use the program as a source of employment for local residents. In communities where jobs are scarce, the program is apt to receive less consideration regarding how it may be improved or integrated with other school activities than as a contribution to the local cash economy; the program's activities and development often hinge on the job security of a single individual, the bilingual teacher.

At several sites, the bilingual program has raised advisory school board concern as to whether it adversely affects students. One member reports the source and nature of this concern:

> At the elementary level they should be teaching all subjects in English. Some teacher told me if the kids learn in Yup'ik first it could ruin the child's life. . . . [Although] we don't want kids to forget the culture, I think now we shouldn't have cultural heritage at the high school.[54]

Another advisory school board member at a different site reported a similar concern: a non-Yup'ik teacher attributed the reason for students not learning English to the bilingual program interfering with other learning; more time ought to be allocated to English lessons and less or none to

Yup'ik. Naturally, advisory school boards as well as parents become confused.

Unlike the school boards and District office staff, most principals are responsible not only for the daily operation of schools but also for teaching as many as seven classes per day. Thus, the time a principal-teacher is able to spend as an administrator is limited. The few principals who do not teach have the necessary time to develop the bilingual programs; unfortunately, however, it appears that the more time available to principals (especially those who do not teach), the less they allocate to the bilingual program. The reasons given are many, but all suggest that the bilingual program is an unimportant program, certainly not a priority.

Program sites with dynamic interaction between principal-teachers and teachers (program planning, "supervised" teaching activities, providing opportunities for teacher growth, collaborative problem solving, open reporting and discussions with staff and school boards) experience greater program satisfaction and "success." Several principals were not only interested in effective school management, but were attempting to learn the Yup'ik language; this appears to strengthen the relationship between the village community and the principal.

The main complaint of principals is that bilingual

staff inservice training activities (requiring staff to leave the village for two or three days at a time) during the school year interferes with the students' education. Although training is recognized as an important and necessary element of increased teacher effectiveness, principals, as well as others, consider the school's responsibilities to the children. According to the District office, principals are expected to deal with these problems independently; if there are emergencies or special problems that the principal cannot handle, then a District office staff member travels to the school to assist. There is very little contact between the superintendent in Bethel and the principals in the villages. Some principals consider this a blessing, because it reduces the bureaucratic demands placed upon them by the District office. Other principals perceive "too much" contact as a reflection on their abilities; this view may discourage principals from seeking programmatic assistance.

In summary, most school administrators and school board members support the programs in varying degrees. A few are concerned about the possible adverse effects of a Yup'ik program on students. Some advisory school boards view the program as a means for retaining students in school, while others consider it an integral part of the education process. Although most principals support the program,

several view it as just another special program that must be dealt with somehow.

Parents' and Students' Perceptions. According to state bilingual education policy, parent and community participation in the program is not only encouraged but is required. Therefore, it is important to consider their perspective of the school's bilingual program. According to proponents of parent-community involvement, the degree to which the school system is a community institution, i.e., the extent to which the school symbolizes the community's identity and values, reflects the extent of community involvement. School activities which meet the approval of the community are not questioned, whereas those activities which evoke opposition are frequently altered or eliminated. For example, at one program site no school activity can compete with religious obligations, holidays, and celebrations, no matter how important the activity. The church is an important priority, and the school must consider its role as subordinate to church authority. Because non-Yup'ik teachers are essentially viewed as outsiders by the village communities, these teachers have little power to change community authority structures. This is unsettling for a few of these teachers and reverses what is considered "normal" in their terms; they are the minorities in the community.

Many parents consider bilingual programs as a means to increase their children's Yup'ik skills; the goal of the programs is to maintain the Yup'ik language and preserve traditional Eskimo lifestyle. If the program were to terminate, most parents would contact their legislative representatives in an attempt to "keep the program going." Most parents indicated that they would assist in the program if requested.

Some students have similar views of the program goals.

> I think the Yup'ik class helps preserve the culture and language.[55]
>
> Yup'ik is important so we don't lose our Yup'ik language.[56]

They feel the program to be sufficiently important that a Yup'ik literacy class should be "a required course for graduation."[57] Others perceive the program as a way to enhance their careers" "I think it's important for other students to take the Yup'ik class. Later on in life, Yup'ik could help them in their jobs."[58]

Some parents view the program as a means to obtain employment as interpreters in a rapidly changing environment with substantially greater village and regional Native corporate activity, oil and gas exploration, and development of fish resources. Some parents proudly remark that the program is a success because students who become literate are

able to participate in Bible readings written in Yup'ik. Other evidence of success includes good grades on report cards, students' happy disposition (few complaints about their Yup'ik classes), ease and comfort of students speaking Yup'ik in and out of school (as compared to their educational experiences in the Bureau of Indian Affairs schools where they were taught to be ashamed of, indeed, punished for speaking Yup'ik), and parents' observations of improved Yup'ik speaking abilities among their children, e.g., increased vocabulary, correct pronunciation, and proper grammar.

Most students enjoy Yup'ik class: "It's fun to work on Yup'ik words."[59] Others enjoy particular activities: "I enjoy the crossword puzzles the most."[60] The students feel confident in the Yup'ik teachers' ability to analyze their Yup'ik language problems: "[The teachers] seem to know where I need help with Yup'ik."[61] Another student thinks a weekly journal is the best method for developing literacy skills.

Some parents did not know what the program goals were, indeed they were unaware the bilingual program even existed. This is due in part to "smooth" program operation; educational processes and issues generally are not a matter of discussion in a community whose economy is based on subsistence. Subsistence activities are more important to the existence of the community than educational matters.

This is not to say that parents are apathetic, but rather to illustrate that, on a daily basis, the process of education is not a criticial concern.

In summary, the perceptions of parents and students reflect their identity with the program for various reasons. There is considerable agreement on the general goal of maintaining the language anu culture through formal instruction in the schools. Parents are not concerned so much with how the program is implemented as they are in maintaining the program's operation. They consider their role in the program as one of support and occasional assistance; beyond that, program implementation is left to the teachers and administrators.

Chapter IV. THREE VIEWS OF IMPLEMENTATION

The literature review presented in this chapter is divided into three sections: implementation as an organizational management process, implementation as a political process, and implementation as an evolutionary process. This division of the literature into three competing concepts of implementation is not intended to imply that they are mutually exclusive, but rather to identify their dominate themes. The literature reviewed in each section

emphasizes a particular view of the implementation process.

IMPLEMENTATION AS AN ORGANIZATIONAL MANAGEMENT PROCESS

Implementation problems are a result of organizational management problems. This chapter emphasizes the interaction between policy implementation and managing change in organizations--change that ultimately will affect the social policy implementation. It is submitted that an overlap exists between political and organizational influences impacting policy outcomes; however, the literature in this chapter emphasizes the impact of organizational management upon social policy implementation.

Elmore's essay[1] on social program implementation models illustrates that understanding the workings of an organization contributes to our knowledge of the implementation process and enables us to deal more effectively with implementation problems; knowledge of organizational behavior is required for implementation analysis. He proposes four conceptual models for analyzing the implementation process. The four models provide a "common sense explanation for implementation failures. And each explanation emphasizes different features of the implementation process."[2]

> The systems management model treats organizations as value-maximizing units and views

> implementation as an ordered, goal-directed activity. The bureaucratic process model emphasizes the roles of discretion and routine in organizational behavior and views implementation as a process of continually controlling discretion and changing routine. The organizational development model treats the needs of individuals for participation and commitment as paramount and views implementation as a process in which implementors shape policies and claim them as their own. The conflict and bargaining model treats organizations as arenas of conflict and views implementation as a bargaining process in which the participants converge on temporary solutions but no stable result is ever reached.[3]

Pressman and Wildavsky (1973), Moore (1978), Mechling (1978), Murphy (1974), and Pesso (1978) agree with Elmore's contention that the knowledge of how organizations function is central to any meaningful analysis of the implementation process.

Jeffrey L. Pressman's and Aaron B. Wildavsky's study of the Economic Development Administration attributes its failures to interorganizational problems where what seemed to be "simple and straightforward is really complex and convoluted."[4] The researchers ascribe the primary implementation problems to "changing actors, diverse perspectives, [and] multiple clearances"[5] among the three levels of government, thereby contributing to numerous delays, cost overruns, and, ultimately, poor performance results.

Mark H. Moore reaches similar conclusions in his assessment of the United States Drug Enforcement Administra-

tion's inability to implement a plan for reducing the supply of drugs in illicit markets. Moore concludes that the key implementation problem is that no centralized authority existed to make those organizational changes required to implement the drug reduction plan. "It is possible that the problems [of implementation] were the inevitable result of trying to coordinate diverse activities in a complex mission."[6]

Jerry Mechling found that implementation problems can occur even if there is centralized authority, well defined programs, and measurable outcomes.[7] New York City's Environmental Protection Agency's (EPA) implementation problems were due to what Mechling called "technical uncertainty or . . . internal conflict."[8] The problems resulted from policy makers' lack of knowledge of the technical aspects of EPA's operations coupled with an ineffective communication system.

Elmore's conceptual models offer a directional orientation that organizations may follow, whereas Jerome T. Murphy's study of the impact of Title V (strengthening state education bureaucracies) of the Elementary and Secondary Education Act of 1965 discusses a basic problem of all organizations: reform directed toward organization change must address

> the enduring attributes of organizations: traditions, norms, and standard operating procedures; subunits with conflicting goals and expansionary tendencies; a preoccupation with pressing short-term problems; search procedures that accept solutions that are good enough rather than optimal; and activities that outlive their usefulness.[9]

Supporting Elmore's basic contention, Murphy's analysis suggests that intra-organizational behavior in policy implementation can provide insight as to how and why policies are implemented.

Finally, Tana Pesso's study goes further in offering suggestions for controlling the behavior of individuals in a social service organization;[10] she focuses on aspects of control and accountability in the implementation process. However, her study is limited in scope, both in terms of the size of the organization analyzed as well as the interrelationship among the various levels of government. She concludes that the most effective method for achieving control and accountability is for top management to closely supervise behavior that cannot be adequately specified by rules and regulations.

The implication for policy implementation analysis from Elmore's perspective is that there are organizational factors associated with poor policy results, factors such as structure, procedures, communications, traditions, and capabilities. These factors do not differ in the context of

education policy considerations. Education policy analyses of the implementation process and outcomes must consider these organizational factors which impact policy directives. The association of organizational factors with social policy implementation is, therefore, one major parameter for analyzing education policy outcomes.

IMPLEMENTATION AS AN EVOLUTIONARY PROCESS

Successful policy implementation is an evolving process; adaptative processes and learning are fundamental to reaching desired program outcomes. Berman (1978), McLaughlin (1976), Farrar, DeSanctis and Cohen (1978), and Majone and Wildavsky (1979) contend that implementation is an evolutionary process requiring continuous adjustments, modifications, and adaptations in the execution of a policy where the environmental context plays a central role in the policy outcome.

Paul Berman argues that implementation problems arise from the relationship between the policy and the institutional context.[11] Milbrey W. McLaughlin shares Berman's implementation perspective; in her observations of two open classroom projects,[12] she found that:

> Where implementation was successful, and where significant change in participant attitudes,

> skills and behavior occurred, implementation was characterized by a process of mutual adaptation in which project goals and methods were modified to suit the needs and interests of participants and in which participants changed to meet the requirements of the project.[13]

McLaughlin discovered that mutual adaptation is essentially a learning process in a conducive environment. She found three strategies critical to successful program implementation: local materials development, staff training, and adaptive planning including frequent staff meetings.[14] Furthermore, she found one common element central to all these strategies: "individual learning and development--development most appropriate to the user and to the institutional setting."[15] She concludes that "the process of mutual adaptation is fundamentally a learning process"[16] among local program implementers.

Concurring with Berman and McLaughlin, Giandomenico Majone and Aaron Wildavsky indicate that implementation is a process of learning and adapting to a policy with its participants and program developments as part of an evolutionary process.[17] "Attainment of a goal . . . is a unitary process or procedure, not a double process of setting the goal and then devising an implementation plan."[18] Policy implementation is a process of continuously transforming policy ideas into actions which affect the objectives and the resources simultaneously.

> It is not policy design but redesign that goes on most of the time. Who is to say, then, whether implementation consists of altering objectives to correspond with available resources or of mobilizing new resources to accomplish old objectives? Indeed, it is often the case that old patterns of behavior are retrospectively rationalized . . . to fit new notions of appropriate objectives [footnote omitted].[19]

This view of implementation allows policy to be developed by the implementer and the implementer's behavior to be directed by the policy requirements. Participation incentives, consensus on goals, individual autonomy, and commitment to the policy by the implementers are important factors in successful policy implementation.[20]

Based upon their examination of Experience Based Career Education programs, Eleanor Farrar, John DeSanctis and David K. Cohen offer a more complex interpretation of this view.[21] Implementation is viewed as a multi-lateral process where the local perspective is emphasized.

> From the center, the periphery is a collection of hurdles and obstacles blocking the federal government's programs, plans, and priorities. But at the periphery, the center's programs, plans, and priorities are a minor distraction in a riot of competing concerns: immediate agreements, responsibilities, and on-going relationships. . . . At the center, the implementation program may be viewed as a linear or bi-lateral process; but at the local level, the implementation is experienced daily as a <u>multi-lateral process</u>.[22]

The researchers identify three factors that impact implementation outcome: (1) federal innovations are introduced to an environment that is politically and sociologically diverse and poorly organized; (2) varying notions are held as to the purposes of education; and (3) the organizational structure of schools, generally characterized as "highly decentralized" and "highly segmented," promotes varying conditions for "implementation to flourish."[23]

The multi-lateral view of implementation provides a more complex explanation for why programs implemented under a common policy at various locations have varying outcomes.

> Not only are local goals and agendas important for an understanding of how a federal program is implemented at the local school district level, but these local dynamics provide a complex view of implementation at the periphery of the federal R&D system. Local history, the political context, regional factors, various role groups, and individual actors all play parts in determining implementation. And most of the action and interaction are at the local level.
>
> . . .
>
> While there will be commonalities in individual and group interests in different program sites, we should expect that local pecularities, and the interaction of goals with this context, will guarantee wide diversity in implementation.[24]

The significance of this perspective is to demonstrate how such factors as regional, political and sociological

diversity, local ideas about the purposes of education, and the fragmented nature of school organizations relate to the development and ultimate realization of program goals. Closer examination of program execution at the local level reveals additional factors: the extent of local participation, program incentives for local participation, provision for individual autonomy and growth, and evidence of commitment to the program. Based on these findings, education policy implementation analysis must consider these various factors in order to gain a clearer understanding as to how programs are administered.

IMPLEMENTATION AS A POLITICAL PROCESS

Other researchers and social scientists attribute implementation failures to politics. Proponents of this theory illustrate the impact of politics on social policy implementation at two levels: the guideline development process and the enactment of statutory provisions for program development. In both cases, implementation problems are characterized by conflict and bargaining among key actors. "Implementation is . . . a struggle over the realization of ideas."[25]

In their conceptual analysis of the many forms and functions of guidelines and the multiplicity of actors

involved in guideline preparation, Francine Rabinovitz, Jeffrey L. Pressman and Martin Rein found that "guidelines cannot impose consistency, rationality, and calm on an environment that lacks these qualities."[26] They note that if laws are ambiguous or highly controversial, then it is probable that their implementation will continue to display similar characteristics.

> Implementation becomes an attempt to reconcile three potentially conflicting imperatives: What is legally required; what is rationally defensible in the minds of the administrators, and what is politically feasible to attract agreement among the contending parties having a stake in the outcome.[27]

They conclude "No easy solution is available to the dilemma . . . of excessive statutory specificity and excessive bureaucratic discretion."[28]

Altman and Sapolsky (1976), Brown and Frieden (1976), McGowan (1976), and Derthick (1976) illustrate the implementation problems which result when guidelines are the primary vehicle to convey program implementation yet are unworkable due to one or more of the following factors: (1) the purposes of the law are vague and ambiguous, (2) the program is highly controversial, or (3) the interrelationships among individuals and organizations involved in administering the program are unstable. Poor results, extended costs, and delays in program execution are the result in each case.

Drew Altman's and Harvey M. Sapolsky's analysis of the regulatory development of the Health Maintenance Organization Act of 1973 concludes that the guideline developers attempted to maintain the integrity of the applicable statute under circumstances where the law was clear in purpose but highly controversial, and where the interrelationships were not stable. As in the legislative process, the guideline developers had to compromise the intent of the law in order to secure agreement from key actors.[29]

In a similar situation involving the Model Cities program, Lawrence D. Brown and Bernard J. Frieden argue that, due to the vagueness of the law, guideline writers found a number of possible interpretations. The primary goal was to operationally define federal program requirements without usurping local control.[30]

> Guidelines were issued in the Model Cities program for the usual reasons: some federal controls on local behavior were thought necessary and local officials needed to be clear about what they were. Yet the politics of the Model Cities guidelines process often prevented them from meeting either the federal need for control or the local need for guidance.[31]

In the education sphere, Eleanor Farrar McGowan studied the implementation of a contract agreement between the National Institute of Education (NIE) and four regional educational laboratories to develop and operate innovative high

school programs which combined work experience and academic learning.[32] She concluded that the resulting problems were due both to ambiguous ideas about what the education innovation was and to NIE's attempt to gain control of project implementation through guidelines.[33] Guidelines played a significant but unsuccessful role in attempting to organize program implementation rationally and systematically.

Martha Derthick's conclusions with reference to federal social services guidelines are similar to those of McGowan, Brown, and Frieden.[34] After several attempts to develop workable regulations, Derthick notes that the single reason each revision failed was that the "guidelines did not fulfill their most elemental functions. They failed to tell federal regional officials and state officials what was expected of them, and to do so in an intelligible way, so as to serve the social purposes embodied in the law."[35] Inadequate definition of social services in both the statute and guidelines made it impossible to determine what services could be purchased with federal dollars.

These studies demonstrate the problems that occur when political interests influence the content of guidelines directing diverse social services. In each case, guidelines were expected to serve the important function of providing program direction and influencing resource allocation; ambiguous, unclear, and highly controversial guidelines born

of the political process contributed to poor policy results. The inference for education is that guideline directives as a factor in policy analysis is essential in determining policy outcomes.

While these studies emphasize problems related to guidelines, Bardach (1977), Bailey and Mosher (1968), and Murphy (1971) demonstrate similar implementation problems when statutory provisions are unworkable. Eugene Bardach contends that the implementation of the Lanterman-Petris-Short Act,[36] a mental health reform provision, was dominated by political considerations involving bargaining and persuasion among its principal actors. He describes implementation of mental health reform as political tactics of intervention in an attempt to administer the Act as legislatively intended. There were numerous attempts to alter the intent of the Act during its implementation, however the legislator who introduced the original bill continued to oversee its enactment in order to maintain the Act's integrity. Bardach depicts this legislative intervention as "fixing the game."

Stephen K. Bailey's and Edith K. Mosher's detailed study[37] describes the kinds of problems encountered by the United States Office of Education in administering Title I of the Elementary and Secondary Education Act of 1965. It is not an implementation study in the same sense that the others are; however, its findings are relevant. The

problems in administering Title I were mainly organizational and political. Bailey and Mosher ascribe the problem of formulating and enforcing regulations to a tight time schedule, an understaffed office undergoing reorganization, and continuous demands from various interest groups and Congressional committees for clarification. Another problem was measuring how Title I improved the academic performance of participating children.[38] Various explanations were given: inappropriate measurement, inadequate knowledge about what actually helps poor children improve academically, and poor implementation of programs at the local level.

In a more recent analysis of Title I, Jerome T. Murphy argues that implementation problems were due to politics.[39] The primary problem was the dispersion of power among three levels of government, the local unit being ultimately responsible for carrying out the program.

> The primary cause . . . is political. The federal system--with its dispersion of power and control--not only permits but encourages the evasion and dilution of federal reform, making it nearly impossible for the federal administrator to impose program priorities; those not diluted by Congressional intervention, can be ignored during state and local implementation.[40]

Murphy suggests that "institutionalized countervailing forces" be established at the local level in order to make the system more responsive to the needs of poor children,

and that improved management and evaluation skills be provided at the federal and state levels. Social scientists attributing implementation problems to politics suggest that such factors as the expertise of the administrative staff executing the policy and consensus among the principal actors on the intent of the law are critical to the resource allocation of the program and its ultimate direction. Accordingly, education policy analysis must include examination of the clarity and purpose of the policy to be implemented as well as the expertise of the staff utilized in the interpretation and administration of the policy.

This brief review of the various theories of social policy implementation provides competing analytic foundations for investigating and analyzing implementation problems associated with Alaska's bilingual education policy.

Chapter V. THE CASE OF BILINGUAL EDUCATION IMPLEMENTATION

In this chapter, the three perspectives of social policy implementation are applied to analyze the Lower Kuskokwim School District bilingual education implementation processes and to explain why a single policy produces a diversity of results. The chapter is divided into three

sections: Lower Kuskokwim School District implementation as an organizational management process, an evolutionary process, and a political process.

LKSD IMPLEMENTATION AS AN ORGANIZATIONAL MANAGEMENT PROCESS

Little evidence was found in the ten bilingual programs examined in the Lower Kuskokwim School District (LKSD) of implementation being an organizational management process--the first view of implementation presented in Chapter IV. The literature on organizational management emphasizes the impact of organizational structure and management on policy outcomes; my observations of LKSD's bilingual education programs indicate that problems were not due to organizational structure or management. Problems arose not in attempting to change established routines, customs, habits, or organization, but rather in attempting to specify the goals, subgoals, and purposes of the program, the various instructional methodologies, and the expected outcomes. Thus, the organizational management theory does not adequately explain implementation of the District's bilingual program.

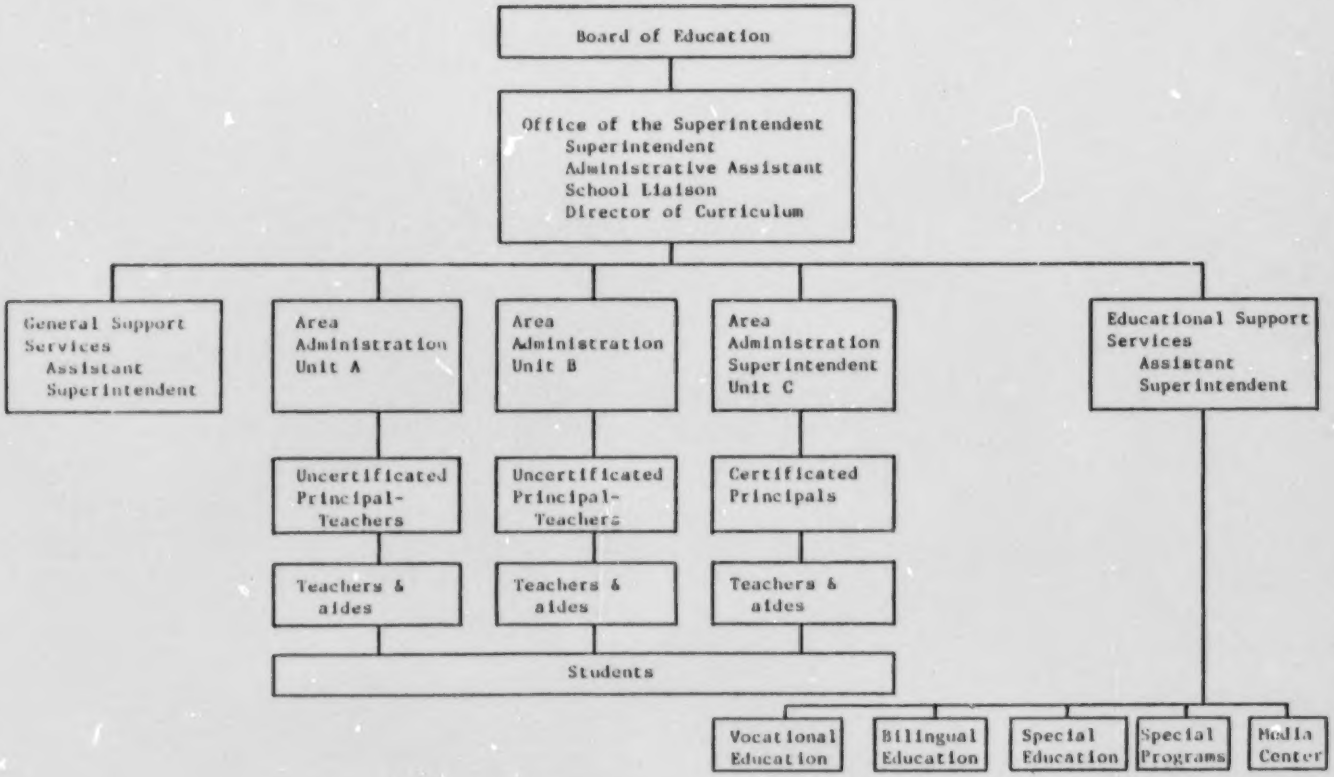
LKSD's operational style resembles a bureaucratic organizational mode consisting of a hierarchical authority structure, with the central manager being the superintendent who supervises subordinates' behavior and adjusts organizational activities according to general management

procedures and policies set by the state or regional school board. The District's approach to school administration is to delegate decision making and responsibilities among various units that exercise relatively strong authority and control over specific tasks and activities. For example, the District's area administrators and program directors have specific tasks, responsibilities, and authority to veto or amend proposed program site activities and budget requests. Indeed, as the District continues to serve an increasing number of village sites, administrators find it increasingly difficult to conduct on-site monitoring activities (due primarily to geographic and environmental conditions) and tend to rely on their veto power, particularly over the budget, to maintain program control.

Early in the spring of 1981, the LKSD regional school board reorganized administrative responsibilities for the 1981-1982 school year in order to develop a closer relationship among the principals, program directors, and the superintendent, and to promote the superintendent's interaction with the education process at two levels: first, the superintendent is to become involved in the daily operations of the schools, and, second, he is to act as an instructional leader. The reorganization is consistent with the regional school board's instructional and curriculum goals established during the 1980-1981 school year:

1. Core curriculum that addresses specific subject areas, learner outcomes, and monitoring design.
2. Teacher orientation for newly certified staff as to the District's philosophy, policies, and cultural-language factors.
3. Career ladder that addresses development of the entire staff from custodians to administrators and includes an annual plan of inservice training.
4. Adequate teacher housing as determined by a task force and advisory school boards.
5. Counseling to assist high school students in identifying career opportunities, colleges, universities, training institutions, and financial aid.
6. Review of graduation requirements for adequacy.
7. Strengthening bilingual education through implementation of a language development program and cooperation with the federal Bureau of Indian Affairs.
8. Positive self-image among students by incorporating Native culture as an integral part of the curriculum, counseling, and staff development.
9. "Magnet" school development for advanced and alternative programs on a voluntary basis.
10. Training to meet identified needs.

The reorganization, illustrated on the following page, creates five subdivisions with equal access to the superintendent. Each subdivision has a discrete function with specific responsibilities. The first subdivision (General Support Services) is directed by an assistant superintendent and encompasses financial management matters for the District. The next three subdivisions are directed by area administrators equivalent in rank to principals but with more power and authority. Two of the area administrators function as middle level administrative coordinators working with the uncertified principal-teachers, while the superintendent acts as the third area administrative coordinator



Organization of Lower Kuskokwim School District in 1981-82

tendent acts as the third area administrative coordinator working with certified principals. The last subdivision (Educational Support Services) is directed by another assistant superintendent who supervises directors of federal and state categorical aid programs such as vocational, bilingual, and special education; media services; and other special programs.

Each program director supervises a staff that varies in number from one to twelve. Within the superintendent's office there are three other administrators: an administrative assistant who works with the advisory school boards and responds to other assignments specified by the superintendent; a school liaison administrator who works closely with the superintendent and principals to facilitate District, state, and nationwide programs; and a director of curriculum who is responsible for curriculum planning, development, and implementation.

The District bilingual program director oversees twenty-three program sites with the assistance of two coordinators whose main functions are to conduct language assessments and on-site language training. In school year 1980-1981, District administrators negotiated the transfer and control of the Bureau of Indian Affairs bilingual materials development center in Bethel, Alaska. For the last two years, the center provided curriculum materials and

training to LKSD bilingual staff, but because of declining federal financial support, the Bureau of Indian Affairs had decided to terminate it. Its staff now reports directly to the bilingual program director. The role of the center did not change substantially: it continues to provide bilingual materials and training to both state and federally supported schools with bilingual programs. In addition to supervising the center's activities, the bilingual director is responsible for arranging bilingual teacher workshops, determining the curriculum needs of each program site, responding to budget requests by assistant superintendents and state agencies, interacting with principal-teachers on program requirements, responding to clarification or information requests by the regional and advisory school boards, submitting annual plans of service and reports to the state, and responding to requests from the superintendent's office. This is not a comprehensive list of the director's duties, but it reflects the complexity and variety of responsibilities of the position.

The reorganization has not changed the roles and functions of the five subdivisions under the superintendent. It has primarily redirected the superintendent's priorities, created several new positions, and changed the title of one subdivision. The new positions include a school liaison administrator, a career counselor for vocational education,

and a language development resource teacher for the bilingual department. The area administrators were formerly village principals; their functions have not changed.

The reorganization demonstrates a willingness to make changes that are bureaucratically and politically feasible. Bilingual program implementation problems are not a result of trying to change organizational structure or procedures, but rather a result of specifying program instructional methodologies and expected program outcomes through policy directives. This is difficult when state statutes and guidelines are unclear as to specific goals, purposes, and expected results; the multiple bilingual education goals and many approaches to program development reflected in LKSD programs are a manifestation of these problems at the local levels. Without state or federal guidance, the District and regional school board carry out the bilingual mandate according to their own concepts. A major problem is inadequate definition of program goals and criteria for success. Without guidance from the statutes or guidelines, the implementers improvise as to what the program should be and how it should be implemented.

The District office in Bethel designs the general bilingual program for all program sites but with little specification for the implementation of program components. The District requires the two options offered in the state

regulations for students in language categories A and B: a transitional bilingual program for kindergarten to grade three, and an enrichment maintenance program for grades four to twelve. Although no specific program is required by the state for students in other language categories (C through F), state regulations specify that at least one of three options, all of which are vague in terms of program definition, delivery, and expected results, be provided for students in categories C through E.

The lack of additional directions for implementation appears to be the weakest aspect of the bilingual regulations and guidelines. State and federal officials allow districts virtually unfettered discretion in deciding what should be offered to students in language categories C to E. LKSD, not knowing what will work, allows each community to determine what is politically feasible: "The local ASB [Advisory School Board] will determine whether and to what extent a Yupik language course will be available [for students in language categories C to E]."[1]

At the community level, the advisory school board, principal, and teachers do what they can to implement the mandate handed to them. This presents a complex variety of social, economic, linguistic, and political circumstances affecting program development. For example, when one considers that in almost all program sites, English was a

second language, the bilingual staff was uncertified, and most administrators did not have much background or experience in bilingual education, the programs are bound to be different. Implementation of federal and state policy at the local level depends on how the particular community interprets its mandate. Programs are influenced by the District's plan, but the plan itself provides significant latitude and flexibility to mold, adjust, and modify programs to meet locally perceived needs. In fact, the District program director, recognizing the variety of program situations, encourages bilingual teachers to adapt and adjust programs accordingly.

LKSD undertook implementation of the federal and state bilingual education reform policy with the expectation that both the federal and state agencies would enforce their policy. However, the federal Office of Civil Rights has conducted only one on-site investigation--approximately a year after LKSD's Lau agreement was accepted by federal officials (1976); they concluded: "Our review revealed that the Lower Kuskokwim School District is implementing and meeting the requirements set forth in its 1978 Title VI Lau Plan."[2] The state department of education has conducted one cursory on-site review of the central office and one village program in 1979. The ability of the state's two program officers to monitor even half of its bilingual programs in

twenty-nine school districts serving over ninety languages is questionable. Both have separate projects to administer as well: a national origin desegregation project under Title IV of the Civil Rights Act of 1964 and a bilingual education project under Title VII of the 1965 Elementary and Secondary Education Act. Both are responsible for working with a state bilingual advisory council which holds quarterly meetings in various cities throughout the state. Both spend most of their time reviewing school districts' program plans, conducting compliance reviews, and planning and providing technical assistance at the district level. District administrators may telephone or visit the state office in Juneau to obtain additional assistance. But beyond the scheduled technical assistance, an annual bilingual conference, budget requests, annual reports, and telephone conversations from time to time, there is little interaction between state department officials and LKSD's program managers.

The state regularly suggests modifications and adjustments of LKSD's annual plan of program services; the District administration either makes adjustments accordingly or justifies its position. However, the state is practically impotent to assert any program control because of the latitude given to districts under the state statutes and regulations. State officials cannot discourage but rather must

encourage local input and control; local programs develop according to locally perceived needs and priorities.

Communication constraints caused primarily by the vast geographical area of the District (forty-four thousand square miles!) and unreliable air transportation contributes to the District's bilingual education implementation problems. The large geographical area exacerbates a "highly segmented" and "loosely coupled" education delivery system. Important information dissemination or matters requiring immediate attention frequently are delayed because aircraft are grounded--for periods of several days. Equally unreliable is the telephone system: if a telephone is available, functioning, and not in use, you may be able to speak to your party. Short-wave radios are reliable, but they require constant monitoring which is not always possible; accordingly, the District has an established schedule for daily communication with each village school. Assuming all equipment is functioning, inclement weather imposes its own limitations. For example, the regional school board schedules its meetings in various villages during the school year; it frequently has not only postponed its meetings due to poor flying conditions, but it has been unable to inform local sites in a timely manner. This causes some embarrassment at the District level and disappointment at the community level. However, even under the best circumstances, com-

munication links between the District office and villages are marginal and inadequate.

Parts of the bilingual guidelines are highly specific and instructional, such as the language assessment section. However, other parts do not provide sufficient guidance or information to guide program management. This causes uncertainty at the program management levels. For example, provisions for curriculum/instructional options are unclear; District administrators have no alternative but to improvise. Bilingual programs need guidance in program implementation. The state regulations do not conflict with local needs, but are simply broad, vague, and unclear: they offer little in the way of administrative guidance towards particular goals. The transitional bilingual-bicultural curriculum/instructional option does not clarify when or how a transition from the student's native language to English should be made; it does not provide adequate guidance for an orderly or uniform transition of instruction in the student's first language to English. Nor does the option identify explicit goals or specific expected results for the curriculum/instructional program alternatives suggested in the guidelines. Unspecified expected program outcomes contribute to the confusion over program direction. What should be measured? Is it moving toward a measurable goal? How does one determine success or failure?

The broad state statute and guidelines provide latitude and flexibility resulting in greater local program initiatives, i.e., permitting local programs to develop according to locally perceived needs and priorities. Without additional federal or state guidance, the District is not inclined to make radical or even moderate changes that may require deviation from established procedures and routines or that may be politically infeasible. Evidence for supporting the organizational management view of implementation is minimal.

LKSD IMPLEMENTATION AS AN EVOLUTIONARY PROCESS

Some evidence was found in the bilingual programs to support implementation as an evolutionary process. Adaptive strategies, constant program reformulation, adjustment, and learning are inherent in the concept of implementation as an evolutionary process; federal goals and local needs are realized through a process described as "mutual adaptation" --mutual adaptation of both the project to its organizational setting and the organizational members to the project. Proponents of this view contend that implementation problems arise from the relationship between the policy and the institutional setting.

In the Lower Kuskokwim School District, there was

little evidence of mutual adaptation: local implementers virtually redesigned the program to incorporate their own concepts of program goals and adapted it to their own physical and human resources. Program plans were developed according to local interpretation of state guidelines. Local implementers adapted and modified the plans to meet local needs and goals. The schools' organization and instructional procedures were not noticeably modified or altered as a result of policy requirements. Thus, programs were modified, but major institutional structures and procedures changed little.

In order to meet local needs or situations, school personnel modified, adapted, and restructured parts of the bilingual programs: curriculum materials were revised, program components were added or deleted, and student activities were reorganized. For example, the paucity of Yup'ik curriculum materials, especially for grades four to twelve, caused bilingual teachers to adapt existing Yup'ik and English materials for the various grade levels. Even when ready-made curriculum guides or materials are distributed to all program sites, such as the WRRC materials, few bilingual teachers used them without some alteration. Modifications extended from adding, deleting, or changing a few words and exercises to a complete redesign more appropriate for their situation. At one site, the WRRC materials required activi-

ties pertaining to an environment that was unavailable locally, so the teacher deleted them. In several other sites, the same materials were considered "too easy" for students, so the teachers revised them. Similarly, at one site, the non-Yup'ik instructor teaching English as a Second Language (ESL) found portions of the ESL curriculum unclear or missing; he substituted non-ESL teaching materials and improvised in other ways when suitable alternatives were not readily available. At another site, an entire program component for English language activities was deleted at the request of the community.

At all sites, adjustments were regularly made in the program procedures. For example, the sequence of program activities were reorganized to fit local calendars (particularly activities relating to the local cultural and physical environment). The extent of Yup'ik language usage during classroom instruction in both elementary and secondary classes varied from nearly all instruction in Yup'ik to only thirty minutes a day. The methods for determining Yup'ik grades varied--from objective to subjective criteria.

Examination of the other side of "mutual adaptation" reveals that no institutional structures and procedures were significantly modified or changed as a result of the policy requirements. The few changes that were made include student scheduling to accommodate the bilingual program;

classroom space being set aside for the programs; provisions for mailing, copying, and use of the short-wave radio and telephone (where available). Aside from these accommodations, which are usually provided to similar special or supplemental programs, the schools and the school district, as a whole system, changed little, while the programs were forced to adapt to the existing institutional structures and procedures.

In summary, although there may have been some evidence of mutual adaptation, most of the adaptation was one-way, namely more changes were made in the type of bilingual program approach implemented than were made in a school or the District. Of the four kinds of possible interaction discussed by Paul Berman which characterize implementation processes, the pattern developed in LKSD most closely resembles "cooptation" interaction: "no adaptation in deliverer behavior, but adaptation in the project to accommodate existing routines";[3] program plans and goals were redesigned to meet local expectations. Implementation of bilingual education programs in LKSD cannot be explained as mutual adaptation or as an evolutionary process, but rather as a complete capitulation to the existing organizational setting.

The reason for this pattern can best be explained by examining the state's policy and guidelines. State bilin-

gual policy contains insufficient subgoals or explanatory directives to guide local implementers. There is no consensus as to the desired outcomes or the means for achieving them among policy makers and implementers. Thus, at the local level, key personnel continue to implement their own interpretations and understandings of program goals, curriculum options, and scheduling activities.

LKSD IMPLEMENTATION AS A POLITICAL PROCESS

There was ample evidence in the LKSD bilingual education experience of implementation as a political process. The literature suggests that implementation is but a continuation of the political process into yet another arena; the program development process provides another opportunity for interest groups and administrators to negotiate on a political basis. When federal officials (OCR) entered memorandums of agreement with the state and, subsequently, with local school districts, they relinquished virtually all authority to the state. OCR relies on the state to obtain and process information from districts as well to provide all necessary technical assistance. From the federal perspective, successful program implementation appears to be measured by the extent to which specified procedures are administered. Acknowledging its limited staff, OCR relies on the cooper-

ation of state officials to monitor and enforce state guidelines incorporating federal criteria (the Lau remedy).

However, the state Department of Education (DOE) is in general unable to impose federal-state priorities on local districts. One reason is the state's commitment to local control of schools derived from an historic concentration of power at the local level. Another is the lack of state personnel to monitor and enforce the guidelines. Although technical assistance is provided on a scheduled basis for all districts during state- or regional-wide conferences, the state's two staff members cannot provide individual technical assistance to local program sites; at best, they are able to meet with district office program implementers. Accordingly, the state's ability to control the implementation process is limited, and as a result, implementation depends on local priorities, as opposed to federal-state priorities, which may not be consistent with the reform goals.

State officials rely primarily on administrative guidelines to convey bilingual education reform, however their guidelines neither provide the kind of information necessary to guide implementers nor retain adequate program control for state officials. Guideline requirements and interpretations are important points of departure for learning and negotiating among local implementers and for controlling the

implementation path of programs, however the state's goals and guidelines are broad, ambiguous, and flexible.

The development of reform goals and guidelines by federal, state, and bilingual education advocates, and their implementation by school personnel have been marked by disagreement, negotiation, and modification. Most Alaskan educators recognize that translating policy mandates into programmatic practice is not a simple task. Like other new education programs, the bilingual education program encountered a variety of implementation problems.

The debate over guidelines resulted in a significant compromise affecting the administrative responsibilities of three governmental agencies. The state agreed to seek additional bilingual education funds from the legislature and to establish a funding mechanism that would assure school districts of adequate funds to implement the new policy requirements. In return, OCR relinquished virtually all of its authority to the state.

Prior to the bilingual reform, schools applied to federal and state agencies for competitive grant funds. Subsequent to the DOE/OCR agreement, the state established a complex formula grant system for allocation of bilingual education funds among the various districts. This formula grant system concentrates funding for those students of greatest need (A and B) on the assumption that there is a correlation

between linguistic characteristics and educational deprivation. This mechanism for distributing funds established an entitlement program which effectively guarantees bilingual education funds for qualifying school districts. The absence of competition for program funding, combined with the state's commitment to local control, weakens the ability of state officials to bargain with school districts over bilingual program activities.

Districts are responsible for developing a program, then implementing it. They assess all students, identify those who are eligible, design programs according to the instructional options in the state guidelines, and apply to the state DOE for approval. The DOE reviews program plans, provides technical assistance, monitors programs, and submits semiannual reports to OCR on the state's and districts' progress in implementing their respective agreements. With the complete delegation of programmatic responsibility to the state, OCR's role is significantly diminished--consisting of little more than reviewing district and state reports submitted by the DOE.

In summary, the OCR agreements entered into by state and local school districts limit responsibility at each level of government. Federal influence dominated during the early stages of policy formation; OCR specified the minimum constitutional criteria which must be met by local dis-

tricts. Currently, federal responsibilities are minimal; the state has the major responsibility for reviewing programs for compliance with the federal-state criteria. Local districts have wide latitude in designing programs and guaranteed access to bilingual education funds, circumscribed only by the effectiveness of state supervision which, in turn, is circumscribed by the inherent difficulties of enforcing a vague policy which lacks specificity as to the means for achieving outcomes. The various approaches discussed in Chapter III demonstrate a state policy which permits a variety of goals to flourish at the local level.

The broad, multiple goals for bilingual education are manifested in the Lower Kuskokwim School District in two ways. First, the LKSD's goals are comprehensive and ambitious covering both language and cultural components for Yup'ik and English skills. Local program goals range from learning English as a language and medium of instruction, to learning Eskimo values, customs, skills, and language. This range of goals is all encompassing and creates conflicts as to what the District's bilingual goals should be. There is broad conceptual agreement that students become equally proficient in Yup'ik and English, both linguistically and culturally, yet should the goal of LKSD's bilingual program be to teach Yup'ik language and culture, or to teach English skills? The state's guidelines provide little guidance on

this issue; the various curriculum/instructional options contain insufficient directives or additional subgoals to identify expected results or means for achieving results.

Regardless of what goal the District selects, either to teach Yup'ik language and culture or to teach English skills, and it elects to implement that goal through the "supplemental English skill concept development curriculum" option set forth in the state's guidelines, what are the essential program components of this option? What are the expected curriculum outcomes? In the guidelines, this option is defined as "a program of instruction in which the instructional content and methods address the language interference needs of students by appropriately supplementing the curriculum provided to the district's nonbilingual students."[4] Beyond this brief description, there is no explanation of how this particular type of curriculum works or how it should be implemented. In addition, the relationship between the multiple goals set forth in the guidelines and this particular option for curriculum instruction is not clear. For example, what methods or processes are required to implement this curriculum option so that it also addresses the following objectives: "provide effective use of English and the student's language, foster careers, aide in obtaining employment, reduce depreciation of local culture and values, stimulate community schools' communica-

tion, build students' positive self-images, allow options for students in choosing a way of life, [and] bring together the students' culture with that of others"?[5] Without additional subgoals or directives, local implementers refine, redesign, and improvise programs according to their own roles, backgrounds, and perceptions of the program goals. Thus, what one program site calls a supplemental English skill and concept development curriculum may not be consistent with another program site's interpretation; indeed, the interpretations may be many, and the programs varied.

Second, the three different approaches to bilingual program development in the Lower Kuskokwim School District illustrate not only divergent approaches but also conflicting goals under a single policy. The broad and all inclusive instructional program options contained in the state guidelines expand the concept of bilingual education to include teaching English as a Second Language and teaching Yup'ik as a Second Language, or a combination of both. However, the goals of these instructional options are not specified, thereby allowing each school or district to define its own goals. The three approaches to program implementation in the Lower Kuskokwim School District address three different problems. The transitional enrichment program (PEP) addresses the situation where students have little English speaking ability, the goal of the program being to

learn English while speaking Yup'ik. The enrichment restoration program teaches Yup'ik to English dominant speakers, and the enrichment maintenance program attempts to balance language usage in both English and Yup'ik. Although the goals for each program may not be consistent, each is permissible under the state's policy.

Conflict among the District's goals had not been clearly anticipated or addressed, much less resolved. Not knowing what else to do, LKSD officials turned to the local communities for direction, yet provided little guidance. This is evidenced by the latitude given each local advisory school board to determine the nature and extent of its program activities, and by the flexibility given local implementers to adjust, modify, and adapt program plans. For example, the guidelines do not clearly define the nature and extent of "parent and community involvement" in any of the program components. The meaning of "involvement" is not sufficiently clear. Does it mean as little as simply being advised about the program, or does it include participation in the decision making process? District program planners have adopted the latter interpretation: they defer to the advisory school boards as to what to implement, if anything. In those communities where parents and school personnel feel bilingual education is important and they are committed to their program, there is little disagreement

over its nature and extent. However, in other communities, particularly those with enrichment restoration programs, there was more controversy as to implementation of any bilingual program.

Other problems are encountered in implementing bilingual education policy in the District. One is the lack of adequate federal and state personnel to monitor and enforce the guidelines. Without guidance from officials outside the District, local implementers define program direction and outcomes based on their own past experiences with bilingual education; weak federal and state influence allow local interpretation of program priorities to dominate the implementation process.

At the federal level, there are six persons at OCR's regional field office in Seattle, Washington who are responsible not only for the myriad Title VI (Civil Rights Act of 1964) violations, but they also have responsibility for monitoring and investigating violations pertaining to such programs as Title IX (Education Amendments of 1972), vocational education, and the handicapped in Washington, Idaho, Oregon, and Alaska. OCR has relinquished virtually all of its authority over local programs to the state. According to one federal official assigned to Alaska, problems at the district level are handled through correspondence or telephone conversations; as part of standard federal operating

procedure, copies of most correspondence are sent to the state Commissioner of Education or Superintendent of Public Instruction regarding on-site reviews and letters of compliance or non-compliance. In an effort to respect the state's role in the local education process, "We try not to interfere with state activities. The state has oversight responsibilities"[6] for the Lau plans. OCR recognizes that the task of monitoring and investigating violations is not easy, because "we don't have enough staff or resources to monitor all projects on-site. Everytime we lose somebody on our staff, we can't replace them."[7] The lack of adequate staff often poses priority problems--which activity is more important at this time, on-site monitoring or investigating a complaint?--and curtails the federal role in the operation of local bilingual programs.

At the state level, bilingual education is administered by a section of the Division of Education Program Support in the Alaska State Department of Education (DOE). Currently, the section consists of two program officers (there never has been more than two). Although state bilingual education policy is usually set at higher levels of the DOE, the two program officers form the link between the state and the school districts.

They are responsible for essentially two functions: one is to approve and monitor programs, and second is to

coordinate and provide technical assistance for districts to develop bilingual programs. Once district applications are submitted, these officers review program plans and approve them. The approval letter may contain remarks or requests for additional data regarding the program plan. Suggested program changes are typically conveyed in such phrases as "your plan could be strengthened by . . .," or "your plan has been approved, but we would like clarification on the following . . . ." The relationship appears to be a cordial one. However, most of the state bilingual staff time is spent in monitoring programs and consulting with district program directors. Program monitoring or "compliance reviews" are conducted by a team of state personnel who review not only bilingual program activities but also check other special and categorical aid programs administered by the state. For example, one bilingual program officer accompanies a non-bilingual team of reviewers for an on-site review. Both bilingual education officers spend a majority of their time on such compliance reviews and preparing write-ups; nine to ten bilingual program reviews can be completed per year, whereas in school year 1980-1981, twenty-nine school districts conducted bilingual programs serving approximately eight thousand students in over ninety language groups. These reviews are programmatic only and do not examine expenditures of funds; the state's bilingual

administrative regulations provide the criteria for conducting these reviews, i.e., is the district adhering to program plans as developed under state regulations? Effective monitoring relies on the cooperation of both local officials and state officials. This delicate interaction depends on the skills of each party in influencing the other, whether the objective is to produce major program changes or to effect minor adjustments.

Time not spent on compliance reviews is utilized in planning technical assistance conferences, regionally and statewide, to discuss matters of local concern to bilingual program administrators. In addition to these activities, both officers work with the State Advisory Council for Bilingual-Bicultural Education which holds quarterly meetings and participates in the annual statewide bilingual education conferences. All of these reviews, planning activities, and conferences are time consuming and leave little opportunity for auditing expenditure of bilingual education funds.

Even if there were adequate personnel at the federal and state levels, there are insufficient trained personnel at the local level to implement the guidelines. The sophisticated nature of the guidelines require some degree of bilingual education expertise in order to understand how they may be implemented. At each program site, bilingual

aides with limited formal education and varying teaching experience often are the only people responsible for the program. In some cases, the principal-teacher or another certified teacher with limited bilingual training will share responsibility for executing the program activities, however, for the most part, bilingual aides execute the day-to-day program activities. Not knowing what else to do, implementers rely on their backgrounds and perceptions of the program purposes in order to direct program development.

The guidelines set forth broad reform goals and specific curriculum/instructional options for achieving those goals, but the guidelines fail to give any guidance as to how schools should implement these options to achieve the various goals. The major purpose of the guidelines appears to be to establish standard application procedure and format in which schools might provide state and federal officials with sufficient data for defensible programs. While state officials therefore may be able to determine that a particular program is not in "compliance," their authority for non-compliance is vague and incomplete. Further, a manual for planning and implementing bilingual programs has been developed to assist districts, but it provides little direction, few suggestions, and nothing on program evaluation or how to determine program success. This manual, and confusing, incomplete responses to programs, being the extent of the

state's guidance, districts must rely on their own resources for determining how implementation should proceed. One state program officer candidly admitted that the state only informs districts of the "areas needing strengthening," not how to implement these areas.

Another problem encountered in implementing bilingual education policy involves local participation. It is one thing to require parent and community participation, but quite another to determine the kind of participation structure which meets the requirements of the guidelines. The degree of local involvement depends upon local interpretation by school staff and community members: in some communities there was significant participation, in others there was little.

An example of the highly sophisticated and bureaucratic nature of the guidelines involves the complex student language assessments required by the guidelines. Bilingual speakers are required to test students and administer the parent questionnaire. Detailed forms and instructions are provided for (1) testing students, (2) administering a parent questionnaire (which may require translation from English to Yup'ik), and (3) administering a teacher's language observation questionnaire; this data must be collected annually as to entering and transferring students and is used to determine their proper language categories. Cumula-

tive data on each student must be recorded, transferred to state forms, and filed.

A second example of the complicated nature of the guidelines involves the method of determining each school's fiscal allocation. The formula grant system is a weighted method for calculating fiscal allocations for the various language categories; it is not a simple procedure. The amount of time required to complete these calculations is significant, and the complicated calculations require considerable training. The state provides a complex set of forms and instructions for determining fiscal allocations, although the instructions assume a certain amount of basic knowledge, such as how to calculate the average daily membership. General knowledge about school administration would be immensely helpful.

Another example relates to developing the instructional staff component of the bilingual program. The guidelines require that districts "insure that the skills of their instructional staff are commensurate with the type of programs selected."[8] If districts do not have any certified bilingual teachers, such as the Lower Kuskokwim School District, they must train these teachers to receive a regular state teaching certificate. Districts are required to establish a staff training plan responding to eight general objectives, such as "objectives which are directly related

to the needs of the students; . . . a design for evaluating the training."[9] Lastly, districts must establish a career ladder for its bilingual paraprofessionals through cooperative agreements with colleges and universities in order to produce certified teachers who are bilingual or who meet the needs of the districts' various bilingual students. This requires knowledge of teacher certification requirements and an assessment as to whether the institute of higher education can deliver these services according to the districts' priorities.

These examples of the state's guideline requirements underscore the need for expertise in bilingual education program design and operation. Guideline directives are ultimately implemented at the local level, but with few adequately trained implementers at this level, it is unrealistic to expect uniform results or, perhaps, any results at all. Delegation of state authority (in the name of local control) to local districts places a heavy burden on districts with little bilingual expertise. If the state were to provide technical expertise for local program administrators in areas such as evaluation, monitoring, and administration, some of the implementation problems would be resolved. Similarly, district administrators must recognize their leadership responsibility by providing adequate support staff and supervision, i.e., guidance and direction

consistent with overall school goals for the local levels.

Examination of the Lower Kuskokwim School District's bilingual staff may provide some insight into the problems associated with translating state policy into action. The director of the bilingual program is a former elementary school teacher; she is a fluent speaker of and literate in the Yup'ik language. The director's role in the implementation process requires working with parents and communities in different language situations. For example, program explanations and clarifications are made to many of the District's Yup'ik speaking advisory school boards and parents by the director. Her training and experience as a local teacher provides valuable insight into problems dealing with teaching and learning in another language. For instance, the director is able to clarify and explain the application of western concepts of instruction to Yup'ik teachers in the Yup'ik language.

The director works independently as an autonomous unit in the District administration, yet she is often required to work with other administrative units of the District. She assembles numerous program elements among the various units in order to meet locally determined bilingual needs; competing demands often require some administrative (and negotiating) skills in order to reach an acceptable resolution. For example, recognizing the need for additional bilingual pro-

gram curriculum materials, the director persuaded the superintendent and the regional school board to take over the operations of a Bureau of Indian Affairs materials development center. In another example, the director entered into a three-party consortium agreement with two institutions of higher education in order to deliver lower division and upper division courses for bilingual staff development. The agreement was necessary to avoid disputes between the competing institutions: the local community college provided all lower division courses, while an Anchorage-based private university provided upper division courses.

Other bilingual staff at the District central office level in the 1980-1981 school year included two coordinators who conducted language assessments and literacy training for bilingual teachers. Both coordinators lack approximately a year of college courses to complete their bachelor of arts requirements. One of the coordinators has had extensive experience as a bilingual teacher. Both spend a majority of their time traveling to the District's twenty-four program sites. When they are not traveling, they attend to curriculum development tasks, organizing and recording student assessment files, or other tasks assigned to them by the director.

At the micro-level of implementation, the program site level, there are virtually no certified school personnel

trained to implement and operate programs for bilingual children as specified by the state guidelines. Of the ten sites examined, only four principals had past administrative experience, and only one principal-teacher had some experience in bilingual education. Like other actors in the implementation process, bilingual teachers and local administrators had limited knowledge of what was required for successful program implementation. Bilingual teachers had the least amount of formal education, and none had a teaching degree or administrative experience; however they tended to have the most experience with bilingual education programs. The bilingual teachers' views of their roles varied widely based on their own experience and training.

It is unrealistic to expect district and local implementers to develop programs with uniform results if the guidelines do not guide (program implementation) and the state provides little technical bilingual expertise. For the most part, the necessary experience and training for effective bilingual program implementation does not exist. Program implementation at any particular site tends to reflect the background, experience, and understanding of the implementers in that community.

Lastly, the lack of specific guidelines for identifying and measuring program outcomes makes success or failure difficult to determine. The lack of definition for expected

program outcomes avoids conflicts; different actors use different standards. Implementers cannot clearly fail. Depending on one's interest in the program, its outcome can be characterized as a success or failure. From the local perspective, the programs are a success, because they reflect aspects of community needs and aspirations; from the federal-state perspective, the clear and uniform outcomes contemplated by federal criteria (the Lau remedy) are foiled by local implementers.

The guidelines do not clearly specify a method for measuring overall program success, not to mention each of the program components (such as the curriculum/instructional options). The guidelines pass this responsibility on to districts.

> Each district shall establish a procedure for evaluating annually the components of its program as set out in its annual plan of service. This procedure must include, but not necessarily be limited to, collecting information concerning the progress of students enrolled in the program.[10]

The state provides evaluation report forms calling for statistical data on student enrollment (according to language category) and staff employed in each program, as well as information regarding parent and community involvement, instructional programs and materials, staff training, student progress, and program management. Only two questions

in the entire form suggest any criteria for program measurement: after identifying the instruments and methodology used to measure student progress, the districts are asked: "What factors do you feel made the greatest contribution to students achieving the objectives of the instructional component? What problems were most influential in preventing students from achieving the objectives of the instructional program?"[11] While the answers to these questions may be important for some purpose, they have little evaluative value. Additional definition and direction is required; without increased guidance and clear specification for meaningful evaluation criteria, it is unreasonable to expect that any determination of program success will be adequate, much less uniform.

The state distributes a booklet entitled "Bilingual-Bicultural Education Criteria for Excellence," which purports to identify "more than thirty elements that are characteristic of successful bilingual-bicultural education programs." However, one state program officer emphasized that the Criteria for Excellence are "not performance standards" to measure program success or compliance, but rather are intended to identify promising program practices in Alaska schools: "Districts can see their progress in the programs and use the criteria as a self-evaluation chart to determine areas that need strengthening . . . . Districts can deter-

mine how they are doing if they want to be nominated for promising practices [in Alaska schools]."[12] Districts are still without guidance or clear specification for meaningful evaluation criteria.

From the local perspective, programs were a political success for a variety of reasons. Some include: students can speak Yup'ik, students can read and write Yup'ik, students like their Yup'ik class, parents and community members are happy that their language and culture are recognized courses of instruction. These self-evaluations are difficult to challenge, because the guidelines fail to adequately define program outcomes or criteria for program evaluation. Different actors may use different standards of success; as previously stated, implementers cannot clearly fail. There is widespread disagreement at all levels of the implementation process as to evaluating program success. The guidelines avoid the controversy by avoiding definition of program evaluation. From the state's perspective, "It's a matter of districts looking at their own evaluation reports. They need to show some sort of testing and areas needing strengthening. . . . If kids aren't doing well on tests, then we offer assistance and try to help determine either an appropriate test or curriculum offering, etc."[13] Thus, the state opts further out of the controversy.

In addition to this omission in the guidelines, the

matter is further complicated by a lack of agreement among policy makers and implementers on how to determine a successful bilingual education program. The lack of agreement may be illustrated by the vague statements of the various multiple purposes of state bilingual education policy. These purposes range from teaching Native language and culture to teaching English as a Second Language. Depending on one's perspective, bilingual education programs may be or may not be successful. If one views the program as a vehicle for providing supplemental cultural enrichment activities, then standardized academic achievement test scores may not be an appropriate way to measure success: a program may not be successful simply because students are six or more months above grade level as measured by the district's student achievement testing program. More appropriate criteria might be to consider the extent to which students incorporate Yup'ik cultural elements into their daily lives or speak only Yup'ik during their Yup'ik class. Whereas, if one views the program as learning English only, then the evaluation criteria may include a standardized achievement test for students learning English as a Second Language.

Until specific and clear evaluation criteria are established or guidance is provided, the local view will prevail: the program is a success, because it reflects aspects

of community needs and aspirations. The state, in effect, provides local communities with the opportunity and resources to develop their own goals and priorities. Thus, there is no single evaluation result.

Without specific evaluation criteria or program performance standards to be used by all school districts, problems will continue in determining whether the state's policy is working successfully. There will be inconclusive evaluations of the state's bilingual education programs.

Chapter VI. CONCLUSION

As bilingual education policy in Alaska has evolved through significant changes caused by federal intervention and the influx of increased sums of money, it is important to examine the policy's impact in terms of its implementation. Analysis of the implementation process examines the programs developed under the policy after its first five years, identifies the problems encountered, and evalulates the policy, as implemented, in light of these problems. This study is an attempt to understand the relationship between policy and its implementation.

Because the reform policy emerged as a result of federal intervention, a brief history of the policy reform was

necessary to understand the context in which reform developments occurred. A review of three competing theories of social policy implementation examined the factors underlying each implementation theory. Local programs were examined to determine how the reform policy was implemented and to identify any problems encountered in the implementation process.

Examination of local operational programs reveals essentially three approaches to implementation, each demonstrating different roles, goals, values (of local implementers), and levels of support. These differences reflect the divergent and often contradictory perceptions of program goals, although the underlying purpose of each is to maintain Yup'ik language usage. Each approach responds to the varied and unique environments of the community and its language characteristics.

The politics of implementation explain why state policy is predominately implemented at the local level, why implementation problems emerge, why there are as many different programs as there are communities in the Lower Kuskokwim School District, why the programs are a success from the local viewpoint but fail to implement the expected federal-state bilingual mandate, and why federal and state policy makers continue to fund programs they are unable to control. Essentially, federal officials opted out of any responsibility for controlling policy implementation, and the

state has deferred its authority to local education agencies. At the local level, implementers adapt program plans to meet their own needs and expectations, because (1) guidelines are broad enough for a variety of interpretations, (2) guidelines contain inadequate program guidance, (3) state officials cannot provide adequate personnel or expertise on any systematic basis, and (4) guidelines contain no criteria for evaluating success or failure.

Broad and general program design provides latitude and flexibility to teachers, administrators, and the community to develop programs according to local needs and goals. Local priorities interacting with diverse teacher and administrator roles and goals contribute to local variations. From the local perspective, the program is a political success, because they reflect aspects of community needs and aspirations. The state provides the resources to communities to do what is important to them. From the state-federal perspective, the clear and uniform outcomes contemplated by federal (the Lau remedy) criteria are not achieved.

The Lower Kuskokwim School District's plan allows and encourages local ideas, concerns, and priorities to emerge; local interpretation of the plan dominates the implementation process. Although implementers' diverse roles and goals may cause inconsistencies with federal policy goals,

there is little interest in resolving these inconsistencies or in conforming local goals to federal goals, because local agendas and interests are being fulfilled in varying degrees. This experience suggests that federal reform measures intended to produce similar outcomes in a variety of community contexts will continue to result in variable outcomes.

EPILOGUE

Since my on-site investigations were conducted in the Lower Kuskokwim School District (LKSD), two developments have occurred that merit reporting. In November 1981, the state Department of Education conducted a compliance review of sixteen LKSD program sites. The compliance team consisted of seven non-bilingual members and one bilingual program officer. In addition to reviewing the bilingual programs, other programs were reviewed, such as special education, vocational education, Title I, and Title IX.

The team found LKSD's bilingual program to be in non-compliance with state regulations in one area: its procedure for assessing student language characteristics was incomplete. LKSD was in partial compliance in another area: re-evaluating the needs of students in language category B. The state requested a plan for reassigning students in language category B to another curriculum and suggested four areas "which needed strengthening": (1) review of District procedures for maintenance of complete files with the various student language tests and forms, (2) inform non-Yup'ik teachers of language assessment and instructional services for bilingual students, specifically about English as a Second Language and its methods, (3) hire additional District staff to control required student data and conduct

teacher training for both English and Yup'ik teachers, and (4) consider arrangements with other districts and agencies regarding materials development and staff training.

The compliance report dealt extensively with procedures, not program goals, outcomes, or expenditure of funds. Although the compliance report was lengthy and detailed, it contained little guidance for implementing the "areas needing strengthening."

Secondly, as a result of the anticipated transfer of between nine and eleven Bureau of Indian Affairs schools to LKSD during the next school year, a fifty percent increase in bilingual services for new students is expected, primarily in language categories A and B. If events develop according to current plans, a total of twenty Bureau of Indian Affairs schools will be transferred to the District by 1983-1984. Transfer of these students will require construction of seventeen new school buildings and hiring of additional certified teachers and principals. With all schools then under LKSD's control, school board members and District office staff hope elementary and secondary curricula will be more coherent and make transition from one school to the next less confusing and disruptive to the student's education experience.

The increasing bilingual needs projected by the District will not only impose additional demands for program

guidance and direction, but will require additional managerial skills. Given the current implementation problems, the increased bilingual program requirements, the lack of guidelines that adequately guide program development, the insufficient training and bilingual technical expertise at the local level, and the inadequate state personnel to monitor or provide expert assistance, implementation of the state's bilingual policy will continue to be a challenging task.

NOTES

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6. Ibid.

7. Ibid., 2.

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11. Ibid., 1-2.

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4. Darbyshire and Associates, Summary of City of Bethel Comprehensive Plan (Anchorage: 1980), 2.

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6. Ibid., 6.

7. Ibid., 10.

8. Ibid., 5.

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11. Alaska Department of Community and Regional Affairs, Division of Community Planning, Problem Analysis: Service Delivery and Government in the Unorganized Borough Draft (Juneau: November 1980), 9.

12. Ibid., 10.

13. Lower Kuskokwim School District, Memo, (Bethel, AK: May 28, 1981).

14. Ibid.

15. Ibid.

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2. 4 AAC 34.050 (1978).

3. 4 AAC 34.065 (1978).

4. Ibid.

5. 4 AAC 34.010 (1978).

6. This is a general description of what goes on in classes based on curriculum guides; interviews with bilingual teachers, non-bilingual teachers, principals, and students; and my limited observations. This is not a scientific study of classrooms where such factors as time spent on task, teaching methodologies, etc., are systematically measured.

7. Interview with Bilingual Teacher, February 5, 1981.

8. Interview with Certified Teacher, February 11, 1981.

9. Interview with Bilingual Director (Bethel, AK: May 4, 1981).

10. Ibid.

11. Interview with Superintendent (Bethel, AK: April 29, 1981).

12. Interview with Bilingual Teacher, April 14, 1981.

13. Interview with Certified Teacher, February 12, 1981.

14. Interview with Certified Teacher, February 2, 1981.

15. Interview with Certified Teacher, February 11, 1981.

16. Interview with Bilingual Teacher, February 3, 1981.

17. Interview with Bilingual Teacher, February 12, 1981.

18. Interview with Certified Teacher, February 4, 1981.

19. Interview with Certified Teacher, February 11, 1981.

20. Interview with Bilingual Teacher, May 1, 1981.

21. Interview with Bilingual Teacher, May 1, 1981.

22. Interview with Central Office Administrator, April 29, 1981.

23. Interview with Certified Teacher, February 11, 1981.

24. Interview with Bilingual Teacher, April 30, 1981.

25. Interview with Bilingual Teacher, April 14, 1981.

26. Interview with Certified Teacher, February 4, 1981.

27. Interview with Certified Teacher, February 3, 1981.

28. Interview with Bilingual Teacher, February 5, 1981.

29. Interview with Bilingual Teacher, February 3, 1981.

30. Interview with Bilingual Teacher, February 3, 1981.

31. Interview with Certified Teacher, February 11, 1981.

32. Interview with Certified Teacher, February 12, 1981.

33. Interview with Certified Teacher, February 4, 1981.

34. Interview with Certified Teacher, February 4, 1981.

35. Interview with Certified Teacher, February 2, 1981.

36. Interview with Certified Teacher, February 4, 1981.

37. Interview with Certified Teacher, February 12, 1981.

38. Interview with Certified Teacher, February 11, 1981.

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40. Interview with Bilingual Teacher, April 28, 1981.

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43. Ibid., 7b.

44. Ibid.

45. Ibid., 7c.

46. Ibid., 7d.

47. Interview with Superintendent (Bethel, AK: April 29, 1981).

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49. Interview with Advisory School Board Member, March 27, 1981.

50. Interview with Advisory School Board Member, April 5, 1981

51. Interview with Advisory School Board Member, March 29, 1981.

52. Ibid.

53. Interview with Advisory School Board Member, February 12, 1981.

54. Interview with Advisory School Board Member, March 29, 1981.

55. Interview with Student, February 5, 1981.

56. Interview with Student, February 5, 1981.

57. Interview with Student, February 5, 1981.

58. Interview with Student, February 5, 1981.

59. Interview with Student, February 5, 1981.

60. Interview with Student, February 5, 1981.

61. Interview with Student, February 5, 1981.

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2. Ibid., 190.

3. Ibid., 185-86.

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20. Ibid., 24.

21. Eleanor Farrar, John DeSanctis, and David K. Cohen, "Alternative Conceptions of Implementation," Draft (Cambridge, MA: The Huron Institute, October 1978).

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24. Ibid., 41-43.

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APPENDIX

State of Alaska Bilingual-Bicultural Education Regulations. Chapter 34, Title 4 of the Alaska Administrative Code, 4 AAC 34.010 *et seq*.

CHAPTER 34.
BILINGUAL-BICULTURAL EDUCATION

Section
10. Purpose
20. (Repealed)
30. (Repealed)
35. State aid
40. Grant entitlement
50. Identification and assessment of language dominance
55. Annual plan of service
60. Parent and community involvement
65. Curriculum/instructional program
70. Materials
75. Instructional staff
80. Evaluation
90. Definitions

4 AAC 34.010. PURPOSE. The purpose of this chapter is to encourage and assist school districts, in cooperation with local communities, to meet the special needs of children of limited English-speaking ability. The department believes that providing equal educational opportunity to these children through the establishment of bilingual/bicultural programs of education will provide more effective use of both English and the student's language, foster more successful secondary and higher education careers, facilitate the obtaining of employment, tend to bring about an end to the depreciation of local culture elements and values by the schools, stimulate better communication between the community and the schools in solving educational problems, effect a positive student self image, allow genuine options for all students in choosing a way of life, and facilitate more harmonious relationships between the student's culture and the mainstream of society. (Eff. 12/29/76, Reg. 60; am 1/14/78, Reg. 65)

Authority: AS 14.07.060
AS 14.30.410

4 AAC 34.020. SCOPE OF STATE-ASSISTED PROGRAMS. Repealed 8/15/78.

4 AAC 34.030. GRANT APPLICATION. Repealed 8/15/78.

4 AAC 34.035. STATE AID. (a) A school district is eligible to receive bilingual education foundation funds under AS 14.17.041(g) when it has submitted and received department approval of the following:

(1) language assessment and enrollment report required by sec. 50 of this chapter; and

(2) plan of service required by sec. 55 of this chapter.

(b) The department shall distribute bilingual education foundation funds based upon the following student ADM weights for the language dominance categories defined in sec. 50(a) of this chapter:

Category	Students Included	Weighted ADM Per Student
A	All	1
B	All	1
C	those whose achievement levels meet the requirements of sec. 55(e)(2) of this chapter;	.2
D	those whose achievement levels meet the requirements of sec. 55(e)(2) of this chapter;	.2
E	those whose achievement levels meet the requirements of sec. 55(e)(2) of this chapter.	.1

(c) A student may be counted in membership for bilingual education foundation funding starting on the first day he receives services appropriate to his language category.

(d) Under requests for proposals issued by the department, districts are also eligible to apply for funds under the provisions of AS 14.30.410(a). The commissioner may award grants to fund in whole or in part those proposals which are determined to be the best submitted according to the evaluative criteria set out in the request for proposals. (Eff. 8/15/78, Reg. 67)

Authority: AS 14.07.060
AS 14.17.041(g)
AS 14.30.410

4 AAC 34.040. GRANT ENTITLEMENT. The commissioner shall consider the following in making grants to school districts:

(1) his evaluation of the program plan submitted under sec. 30 of this chapter, ranked in the following program priority order:

(A) programs directed to monolingual speakers of a language other than English;

(B) programs directed to bilingual speakers whose proficiency in the language in which instruction is given is not sufficient for instructional purposes;

(2) numbers of students in each program priority;

(3) relevant cost factors in serving variable numbers of students in the same language program priority; and

(4) program costs related to the amount of special instruction required based on the needs of identified students. (Eff. 12/29/76, Reg. 60)

Authority: AS 14.07.060
AS 14.30.410

4 AAC 34.050. IDENTIFICATION AND ASSESSMENT OF LANGUAGE DOMINANCE. (a) Before December 1, 1977, each school district shall carry out an identification and assessment of language dominance for the purpose of categorizing each student in the district in one of the following:

Category	Definition
A	students who speak a language other than English exclusively;
B	students who speak mostly a language other than English, but also speak some English;
C	students who speak a language other than English and English with equal ease;
D	students who speak mostly English but also speak a language other than English;
E	students who speak English exclusively but whose manner of speaking reflects the grammatical structure of another language;
F	students who speak English exclusively but do not fit category E.

(b) Following the initial assessment made under (a) of this section, districts shall identify and assess all students new to the district within 30 days of their enrollment in school.

(c) The identification and assessment process under (a) and (b) of this section shall consist of the following:

(1) informing parents through workshops, public meetings or public announcements of the purpose and importance of both the assessment procedure and the development of bilingual/bicultural programs and of the necessity for complete and accurate data on the parent questionnaire, and how to complete the questionnaire which they will be asked to complete;

(2) selecting, orienting and training qualified persons to administer the assessment instruments and evaluate the results;

(3) providing a parent questionnaire, reviewed and accepted by the department, to the parents or guardians of each student and assuring that the questionnaire is completed and returned. If the results of the parent questionnaire clearly indicate a category F student and if the student's teacher or teachers agree that the child is not in categories A through E, the district may identify that student as being in category F and need not carry out the remaining steps of the assessment process as to that student;

(4) using a language observation questionnaire, reviewed and accepted by the department, and conducted by a person who is bilingual in the student's home or primary language which is other than English, for all students not initially identified as being category F under (3) of this subsection. Based on the results of this instrument and the parent questionnaire, a student shall be tentatively identified as being in one of the six categories set out in (a) of this section;

(5) administering a language assessment instrument, which has been reviewed and accepted by the department, to all students tentatively identified under (4) of this subsection as being in categories A through D. Following administration of this instrument, the student shall be identified as being in that category which reflects the least degree of English facility as established by the three assessment instruments;

(6) reviewing the results of the parent

questionnaire and language observation questionnaire for those students tentatively identified under (4) of this subsection as being in categories E and F and modifying those results as necessary with systematic or prior observation by the staff of the students' school and identifying those students as being in either category E or F.

(d) Each district shall submit to the department, no later than December 1, 1977, for the initial assessment required under (a) of this section and by November 1 of each subsequent year, a compilation and analysis of its assessment data. (Eff. 1/14/78, Reg. 65)

Authority: AS 14.07.060
AS 14.30.410

4 AAC 34.055. ANNUAL PLAN OF SERVICE. (a) Each district with a school attended by eight or more category A through D students who speak the same language other than English or eight or more category E students for whom an educational program is required under (e) of this section shall file with the department, by March 15 of each school year, a plan of educational service which complies with the provisions of secs. 60 – 80 of this chapter. To be eligible for bilingual education foundation funds under AS 14.17.041(g), a district must file a plan of service for one or more weighted ADM.

(b) The plan of service required under (a) of this section must contain the following:

(1) a parent community involvement component;

(2) a curriculum/instructional component;

(3) a materials development component;

(4) a staff development component;

(5) a description of the district's process for implementing and coordinating the plan of service;

(6) an evaluation component.

(c) A district may request variances from the bilingual/bicultural education program requirements set out in secs. 60 – 80 of this chapter. The commissioner may grant a requested variance upon a showing by the district of program feasibility and that the proposal promises to provide equal education opportunity.

(d) Upon filing of a plan of service, the department will review it and either approve it or return it for necessary modifications within 60 days of its receipt. Upon approval by the department the district shall implement its plan.

(e) Appropriate programs must be provided to the following students:

(1) all students in categories A and B;

(2) those students in categories C, D and E whose overall achievement is at or below

(A) minus one standard deviation on a normed test; or

(B) one year below grade level as measured by the district's ongoing student achievement testing program.

(f) A district may, at its option, provide programs to students who are not included in (e) of this section.

(g) A district may meet the educational needs of category E students described in (e)(2) of this section through nonbilingual programs of instruction which it provides generally to its underachieving students. However, the plan of service required by this section must identify and describe those programs.

(h) Districts may comply with the requirements of secs. 60 – 80 of this chapter by a phased-in process designed to accomplish full implementation of those requirements by the end of the 1978-1979 school year. The phase-in must at least meet the following time frames:

(1) initiation of appropriate community involvement activities under sec. 60 of this chapter by the end of the first semester of the 1977-1978 school year;

(2) significant progress toward establishing appropriate curricula under sec. 65 of this chapter, with particular emphasis on providing

programs to students in categories A and B, identifying instructional materials necessary under sec. 70 of this chapter, and recruitment and training of instructional staff under sec. 75 of this chapter by the close of the 1977-78 school year; and

(3) submission of the district's initial plan of service under this section by March 15, 1978. (Eff. 1/14/78, Reg. 65; am 8/15/78, Reg. 67)

Authority: AS 14.07.060
AS 14.30.410

4 AAC 34.060. PARENT AND COMMUNITY INVOLVEMENT. (a) Districts shall provide for the direct involvement of the parents of bilingual/bicultural students and other members of the community in the initial development and subsequent evaluation and improvement of the program, including providing sufficient information and allowing adequate time for the parents to review and discuss all aspects of the program with responsible district personnel.

(b) Districts shall conduct an informational program for parents of students and other members of the community in each language group for which a program is or will be conducted. This program includes notices in appropriate media and languages as well as community meetings. (Eff. 1/14/78, Reg. 65)

Authority: AS 14.07.060
AS 14.30.410

4 AAC 34.065. CURRICULUM/INSTRUCTIONAL PROGRAM. (a) Unless a variance has been approved by the commissioner under sec. 55(b) of this chapter, the curriculum of the district must include, for each category of student for whom a program must be provided under sec. 55(e) of this chapter, one or more of the following options:

(1) category A and B students at the primary and intermediate level

(A) a bilingual/bicultural curriculum;

(B) a transitional bilingual/bicultural curriculum;

(2) category A and B students at the secondary level

(A) a bilingual/bicultural curriculum;

(B) a transitional bilingual/bicultural curriculum;

(C) a high intensity language training curriculum;

(3) category C and D students at all levels

(A) a bilingual/bicultural curriculum;

(B) an English as a second language curriculum;

(C) a supplemental English skill and concept development curriculum;

(D) a language other than English as a second language curriculum;

(4) category E students at all levels

(A) an English as a second language curriculum;

(B) a supplemental English skill and concept development curriculum;

(C) a language other than English as a second language curriculum.

(b) The district plan must also provide a process for reevaluating the needs of each student in the program on an on-going basis with reassignment to another curriculum or individualizing of instruction occurring as necessary to assure appropriate educational services.

(c) At the request of a student's parent or guardian and if the requested alternative program is reasonably available, the district shall place the student in its regular program for nonbilingual students or in a level of the bilingual program with less non-English emphasis than that called for by the student's assessment category.

(d) For bilingual/bicultural students in schools with fewer than eight students in one or more of the categories A through E for whom a program must be provided under sec. 55(e) of this chapter, districts shall either provide a curriculum as set out in (a) of this section or it shall individually meet the needs of each of those students by means of one-to-one tutoring and assistance.

(e) As used in this section

(1) a "bilingual/bicultural curriculum" means a program of instruction which makes use of a student's language other than English and cultural factors and maintains and develops the student's skills in that language and culture. Additionally, it introduces, develops and maintains all the necessary English skills for the student to function successfully in English. The language other than English instruction may vary from being in the language arts of the language other than English to being in all discipline areas, with the appropriate combination of language other than English and English instruction determined by the district in conjunction with the parents of its bilingual students;

(2) a "transitional bilingual/bicultural curriculum" means a program of instruction which makes use of a student's language other than English and cultural factors in instruction only until the student is ready to participate effectively in the English language curriculum of the regular school program. Once this occurs. further instruction in the language other than English is discontinued. Until the student is ready to participate effectively in the English language curriculum of the regular school program, instruction in the language arts of the language other than English is provided, and English is taught as a second language;

(3) an "English as a second language curriculum" means a program of instruction which teaches English as a second language, has culturally relevant material in its curriculum, and provides instruction in other subject matter in English;

(4) a "high intensity language training curriculum" means a program of instruction which gives a student intensive instruction in English until that student is ready to participate effectively in the English language curriculum of the regular school program, with the student working exclusively on acquisition of English language skills. Following acquisition of those skills, the student is phased into the same curriculum as that provided to the district's nonbilingual students.

(5) a "supplemental English skill and concept development curriculum" means a program of instruction in which the instructional content and methods address the language interference

needs of students by appropriately supplementing the curriculum provided to the district's nonbilingual students;

(6) a "language other than English as a second language curriculum" means a program of instruction which teaches the student's language other than English as a second language. At the primary level emphasis is on oral language skill development. At the intermediate and secondary levels, language literacy instruction would begin after oral skills are learned. Instruction in other subject matter is conducted in English. At all levels, a special effort is made to maximally incorporate the student's non-English culture into the curriculum. (Eff. 1/14/78, Reg. 65)

Authority: AS 14.07.060
AS 14.30.410

4 AAC 34.070. MATERIALS. (a) A district shall provide adequate instructional materials to support and achieve the goals of the instructional programs selected under sec. 65 of this chapter.

(b) If adequate materials are not available, the district shall establish an action plan for developing or otherwise securing needed materials. The district plan should involve classroom teachers, individuals who are native to the language other than English and culture for which the materials are to be developed and linguists in the development and review of materials so as to assure that the materials are educationally and linguistically sound and that they are an accurate reflection of the appropriate language and culture. (Eff. 1/14/78, Reg. 65)

Authority: AS 14.07.060
AS 14.30.410

4 AAC 34.075. INSTRUCTIONAL STAFF. (a) Districts shall insure that the skills of their instructional staff are commensurate with the type of programs selected.

(b) If regularly certificated (Type A) teachers who are appropriately bilingual cannot be obtained, bilingual instructors may be used to implement the program. However, if bilingual instructors are used

(1) the district shall implement an action plan to train or otherwise secure certificated (Type A) teachers who are bilingual in other than English languages for which the district offers its program; and

(2) the district shall assure that the salaries of its bilingual instructors are commensurate with the level of responsibilities and duties performed by them and with their training and experience.

(c) Nothing in (b) of this section limits a district's authority to require, as a condition of continued employment, that a bilingual instructor enter into a formal program of training which leads to a Type A certificate.

(d) Each district shall develop a staff training plan for all bilingual program instructional personnel, both permanent and temporary, which includes, but is not necessarily limited to, the following:

(1) objectives which are directly related to the needs of the students;

(2) methods by which those objectives can be reached;

(3) methods for selecting teachers, paraprofessionals, and potential teachers for training;

(4) the names of individuals who will conduct training;

(5) the location of the training;

(6) content of the training, including as one element linguistic/cultural familiarity with the students' background;

(7) a design for evaluating the training; and

(8) a proposed time frame for carrying out the training plan.

(e) As part of the plan of service required under sec. 55 of this chapter, each district shall set out specific recruitment and selection processes for its bilingual program staff and shall establish, through cooperative agreements with institutions of higher education, and make available a career ladder for its bilingual paraprofessionals which leads to regular (Type A) certification.

(f) The student-to-staff ratio for the district's bilingual program may not be higher than the overall student-to-staff ratio for the district. (Eff. 1/14/78, Reg. 65)

Authority: AS 14.07.060
AS 14.30.410

4 AAC 34.080. EVALUATION. Each district shall establish a procedure for evaluating annually the components of its program as set out in its annual plan of service. This procedure must include, but not necessarily be limited to, collecting information concerning the progress of students enrolled in the program. An evaluation report of the bilingual-bicultural program must be submitted to the department by June 30 of each year. (Eff. 1/14/78, Reg. 65; am 8/15/78, Reg. 67)

Authority: AS 14.07.060
AS 14.30.410

4 AAC 34.090. DEFINITIONS. As used in this chapter and AS 14.30.400 and 14.30.410, unless the context otherwise requires

(1) "commissioner" means the commissioner of education;

(2) "children of limited English-speaking ability" means both children born in the United States and children not born in the United States who have difficulty performing ordinary classwork in English due to an interference with their English comprehension by a language other than English;

(3) "bilingual-bicultural education program" means an organized program of instruction in elementary or secondary education which is designed for children of limited English-speaking ability, uses English, the child's primary language, or both as a means of instruction, allows children to progress effectively through the educational system, and which may include elements of the culture inherent in the language;

(4) "department" means the department of education;

(5) "school district" means both city and borough school districts and regional educational attendance areas;

(6) "school which is attended by at least eight pupils" means either an elementary school or a secondary school with eight or more pupils in regular daily attendance. (Eff. 12/29/76, Reg. 60)

Authority: AS 14.07.060
AS 14.30.410

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